WORKPLAN ADDITIONAL SOIL AND SOIL VAPOR INVESTIGATION

FORMER MONDO CHROME 4933 FIRESTONE BOULEVARD SOUTH GATE, CALIFORNIA SCP No. 760, SITE ID No. 2043G00

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1.0 INTRODUCTION

This workplan has been prepared by FREY Environmental, Inc. (FREY) for an additional soil and soil vapor investigation at 4933 Firestone Boulevard in South Gate, California (Site) (Figures 1 and 2). Initially, FREY submitted three separate workplans (one for a soil investigation, one for a soil vapor investigation and one for a groundwater investigation) in response to a Regional Water Quality Control Board (RWQCB) letter dated January 26, 2011 (Appendix A).

On August 30, 2011, representatives from FREY, the responsible parties and the RWQCB met on Site and discussed the soil vapor, soil and groundwater investigation workplans. It was agreed that the workplans would be revised to incorporate concerns expressed by the RWQCB. For completeness, FREY has combined the soil and soil vapor investigation workplans into this single document. The groundwater investigation workplan will be discussed under separate cover.

2.0 SITE DESCRIPTION

2.1 SURFACE CONDITIONS

The Site is located on the north side of Firestone Boulevard approximately 300 feet to the east of the intersection of Atlantic Boulevard in South Gate, California. The Site consists of one, rectangular shaped unit in a single story commercial building. Site dimensions are approximately 20 feet from east to west and approximately 100 feet from north to south. The Site has a concrete floor approximately 6-inches thick. The Site shares a common wall with a printer on the east and a clothing manufacturer on the west. A sidewalk and Firestone Boulevard border the Site on the south and Mason Street borders the Site on the north.

2.2 REGIONAL GEOLOGY AND HYDROGEOLOGY

The Site is located in the Los Angeles Forebay area of the Central Basin (DWR, 1961). The Central Basin extends over most of the Coastal Plain of Los Angeles County, east and northeast of the Newport-Inglewood uplift. It is bounded on the north by the Hollywood Basin and a series of low hills extending from the Elysian Hills on the northwest to the Puente Hills on the southeast. The Central Basin is divided into four parts for descriptive purposes: the Los Angeles Forebay Area, the Montebello Forebay Area, the Whittier Area, and The Central Basin Pressure Area (DWR, 1961).

The Los Angeles Forebay Area is overlain by the Downey Plain, an area which is generally flat and slopes gently to the south-southeast. The Downey Plain is a depositional feature which consists of coalescing alluvial fans formed by the Los Angeles and San Gabriel rivers (DWR, 1961). The Los Angeles River, contained within a concrete lined channel, is located approximately ½ mile east of the site.

Water-bearing sediments within the Los Angeles Forebay Area range in age from Recent to Pliocene and extend to a probable maximum depth of 2,000 feet in the site area. Groundwater zones (aquifers) directly underlying the site in descending stratigraphic order include the semiperched zone and Gaspur aquifers making up the Recent alluvium. Underlying the Recent alluvium are older aquifers identified as the Exposition and Gage aquifers of the Lakewood Formation, and the deeper Hollydale, Jefferson, Lynwood, Silverado, and Sunnyside aquifers of the San Pedro Formation (DWR, 1961).

The Recent Alluvium in the Site vicinity consists of the Semiperched aquifer, the Bellflower aquiclude, and the Gaspur aquifer. In general, the Semiperched aquifer consists of sand and gravel overlying the Bellflower aquiclude. The Bellflower aquiclude is composed mainly of clays and silt but in some areas consists of clayey sands and gravel. The Gaspur aquifer, consisting of primarily coarse sands, gravel and cobbles, underlies the Bellflower aquiclude.

FREY has logged soil lithology at the Site to a maximum depth of 101.5 feet bgs. Comparing the soils types encountered in soil borings and published documents, FREY estimates that the upper 13 feet bgs of soil beneath the Site is part of the Semiperched aquifer. This thin section of coarse grained alluvium lies upon interbedded coarse and fine grained sediments of the Bellflower aquiclude from approximately 13 feet bgs to 70 feet bgs. The sediment logged from 70 feet bgs to 101.5 feet bgs were sands and are assumed to be the upper section of the Gaspur aquifer. According to published information the Gaspur aquifer is estimated to be 90 feet thick below the Site with a base at approximately 160 feet bgs.

Groundwater beneath the Site occurs at a depth of approximately 50 feet bgs in the coarse grained sediments of the Bellflower aquiclude.

2.3 NEAREST GROUNDWATER SUPPLY WELL

The City of South Gate maintains groundwater production well #7 located approximately 400 feet north of the Site at the termination of Nevill Avenue (Figure 1). Well #7 is currently shutdown due to concentrations of hexavalent chromium. Well #7 was drilled to a final depth of 863 feet bgs in 1935 and is perforated between 500 and 600 feet bgs (South Gate, 2000).

3.0 BACKGROUND

3.1 SITE INSPECTION AND MATERIAL REMOVAL

A Site walk was conducted on November 2, 1990 by Chem Tech Systems, Hunt Management Co, and Applied Geosciences. The Site was observed to be vacant and described as a one story building with approximately 1,800 square feet of floor space. The walls are of concrete block construction with a concrete floor. A small reception/office area is located in the southern-most portion of the building with the remainder of the building used as work areas. The buffing area, restroom and

storage areas are located immediately north of the office/reception area and extend approximately 50 feet from the front of the building. The northern half of the Site consisted of an electroplating area. The electroplating area contained several process tanks with a berm constructed of cinder blocks, various drums and other containers and a clarifier (Applied, 1991).

Chem Tech developed an inventory of the potentially hazardous materials and wastes observed on November 2, 1990. The inventoried wastes consisted of acidic nickel solution, alkaline metal solution, acid, chrome solution, nickel solution, alkaline solution with cyanide, dry cyanide compound, sludge, flammable liquid, nickel/chrome sludge, and solidified alkaline cleaner. Quantities ranged from 6.5 pound drums to 3,200 gallons. Chem Tech reportedly removed all listed items in December of 1991 (Applied, 1992a).

3.2 INITIAL SUBSURFACE SOIL INVESTIGATION

On April 23, 1992, Applied Geosciences hand augered soil borings HB1 through HB7 to depths between 10 and 15 feet below the ground surface (bgs) in the locations shown on Figure 3. Soil samples were collected from depths of 2, 5, 10 and 15 feet bgs from each boring. Soil samples were selectively analyzed for volatile organic compounds (VOCs) and selected metals (Applied,1992a).

Sixteen soil samples were analyzed for VOCs. Three soil samples did not contain PCE. PCE was detected in 13 of the 16 soil samples at concentrations ranging from 6 micrograms per kilogram (ug/kg) to 41,000 ug/kg. PCE was reportedly the only detected VOC (Table 1).

Concentrations of total chromium ranged from 11.5 mg/kg to 235 mg/kg. Soluble chromium concentrations ranged from 2.9 mg/L to 10.7 mg/L. Cadmium concentrations ranged from 0.06 mg/kg to 43.1 mg/kg (Applied, 1992a). Metal concentrations have been summarized in Table 2.

3.3 ADDITIONAL SUBSURFACE SOIL INVESTIGATION

Between August 18 and 20, 1992, Applied Geosciences drilled 4 soil borings with a hand auger (labeled HB8 through HB11) and 12 soil borings (labeled B1 through B12) with a drilling rig. Soil boring depths ranged from 10 feet bgs to 40 feet bgs. Groundwater was not encountered during this investigation. Soil samples were collected and analyzed for VOCs, selected metals, pH and cyanide (Applied, 1992b). Soil boring locations are shown on Figure 3.

Forty six soil samples were analyzed for VOCs. PCE was detected in 39 of the 46 soil samples at concentrations up to 12,000 ug/kg (B8 at 2 feet bgs). Trace concentrations of toluene, TCE, and 1,4-dichlorobenzene were detected in as many as 7 soil samples (Table 1). Concentrations of chromium, nickel, cadmium and cyanide were also detected in various soil samples but in concentrations below respective screening levels for industrial soils as published in the California Human Health Screening Levels (CHHSLs) (Cal-EPA, 2005).

Applied Geosciences concluded that three areas of concern were present at the Site: the former processing area, clarifier area, and the accumulated liquid spill area. The former processing area and the clarifier are located in the northern half of the building while the liquid spill area extends north from the building and down the center of Mason Street to the east approximately 50 feet (Applied, 1992b).

3.4 VAPOR EXTRACTION WELL INSTALLATION AND TESTING

FREY drilled and sampled one soil boring (VEW1) to a final depth of 50 feet bgs on June 27, 1996 in the location shown on Figure 3. Soil samples were collected at five foot depth intervals and selected samples analyzed for halogenated volatile organic compounds (HVOCs). PCE and TCE were detected at maximum concentrations of 0.212 mg/kg (25 feet bgs) and 0.070 mg/kg (50 feet bgs), respectively, in soil samples collected from the boring (Table 1). FREY converted the boring to a 2-inch diameter vapor extraction well (VEW1) which has a screened interval from 15 feet bgs to 45 feet bgs.

FREY also collected soil samples from hand auger borings FB1 through FB5 at the Site on June 27, 1996 (Figure 3). Soil samples were collected from depths of approximately one foot beneath the concrete slab in each of the five borings and analyzed for chromium, chromium VI and cadmium. Chromium VI was not detected above laboratory detection limits in the soil samples. Chromium and cadmium were detected at concentrations up to 69.6 mg/kg and 8.7 mg/kg, respectively (FREY, 1996). These concentrations are well below the CHHSLs for industrial soils (Cal-EPA, 2005).

FREY returned to the Site on July 11, 1996 and installed two vapor probes to facilitate future vapor extraction testing activities. The vapor probes were constructed of 1/4-inch diameter tygon tubing with screened intervals between 19 and 20 feet bgs and 39 and 40 feet bgs. Vapor probe locations are shown on Figure 3 (FREY, 1996).

FREY conducted a short term vapor extraction test on July 16, 1996. FREY extracted vapors at flow rates up to 160 cubic feet per minute. The maximum radius of influence calculated was 80 feet. PCE, TCE and benzene were present in vapor samples at concentrations up to 32.8 parts per million per volume (ppmv), 26.0 ppmv and 1.55 ppmv, respectively. Soil vapor sample data is summarized in Table 3 (FREY, 1996).

3.5 GROUNDWATER MONITORING WELL INSTALLATION

FREY drilled and installed groundwater monitoring wells MW1, MW2 and MW3 on December 2, 1998 in the locations shown on Figure 3. Soil samples were collected at five foot depth intervals from each boring, however, only those samples from MW1 were submitted for laboratory analyses (FREY, 1999).

Groundwater monitoring wells MW1, MW2 and MW3 were constructed of 2-inch diameter PVC blank casing and screen. The screened interval of each well extends between 30 and 55 feet bgs.

Concentrations of PCE and TCE were detected in soil samples collected from well MW1. Concentrations of PCE decreased with depth from 0.515 mg/kg in the sample collected from 15 feet bgs to 0.010 mg/kg in the sample collected from 35 feet bgs (FREY, 1999).

3.6 ADDITIONAL SOIL AND GROUNDWATER INVESTIGATION

On June 28 and 29, 2001, FREY drilled and sampled three soil borings (B12, B13 and B15) to final depths of 50 feet bgs with a direct push drill rig. Soil borings B12, B13 and B15 were drilled at approximate distances of 100 feet to the west, north and east of groundwater monitoring well MW1 in order to assess the lateral extent of groundwater containing VOCs. Groundwater samples were collected from each boring at approximate depths of 40 feet bgs and analyzed for VOCs. TCE was the primary VOC detected in groundwater samples and ranged from 180 ug/L to 453 ug/L. PCE concentrations ranged from non detect (detection limit of 10 ug/L) to 258 ug/L (Table 4) (FREY, 2001).

In addition, FREY drilled soil borings B17 and B18 inside the Site building on June 28 and 29, 2001. Soil borings B17 and B18 were drilled to final depths of 40 and 48 feet bgs. Boring B17 was drilled adjacent to the sample box location on the former clarifier. B18 was drilled adjacent to previously drilled boring HB3. Soil samples collected from HB3 contained the greatest concentrations of chromium. Soil samples collected from B17and B18 were analyzed for total chromium and hexavalent chromium.

Total chromium was detected in each soil sample but in concentrations well below the CHHSL for industrial soils. Hexavalent chromium was detected in two of the 10 soil samples submitted for analyses at concentrations of 6.60 mg/kg (B17-30) and 18.1 (B17-35) (FREY, 2001). Metals concentrations have been summarized in Table 2.

FREY returned to the Site on August 7, 2001 and drilled and sampled boring B16 to a final depth of 100 feet bgs to evaluate the presence of total chromium, hexavalent chromium, cadmium, total organic carbon, and VOCs in soil and groundwater (Figures 3 and 4). VOCs were not detected in soil samples collected from B16 with the exception of the 60 and 65 foot samples which contained TCE at concentrations up to 0.024 mg/kg. Total chromium and hexavalent chromium were detected at concentrations but well below the CHHSLs for industrial soils. Groundwater samples collected from B16 at depths of 70 and 100 feet bgs contained TCE at concentrations of 710 ug/L and 290 ug/L, respectively. PCE was detected at concentrations of 82 ug/L and 44 ug/L in the 70 foot and 100 foot, respectively, in groundwater samples from B16 (FREY, 2001).

3.7 GROUNDWATER MONITORING WELL SAMPLING

Groundwater monitoring wells MW1, MW2 and MW3 were sampled on a quarterly basis between December 7, 1998 and December 13, 2001, semi annually in 2002 and 2003, once during 2008 and quarterly in 2011.

Groundwater samples collected from well MW1, MW2 and MW3 have consistently contained concentrations of PCE, TCE, cis 1,2-DCE and infrequently contained concentrations of trans 1,2-DCE, vinyl chloride, 1,2-DCA, and cadmium and nickel. TCE and PCE are the primary contaminants of concern in the groundwater samples collected from MW1, MW2 and MW3. TCE and PCE have been detected in concentrations up to 1,000 ug/L and 707 ug/L, respectively, in groundwater samples collected from MW1. Concentrations of TCE and PCE in groundwater samples collected from MW2 and MW3 have been significantly less (FREY, 2011a).

The depth to groundwater ranged from 40 to 41 feet bgs between 1998 and 2002 but has dropped to depths between 47 and 48 feet bgs in 2011. Groundwater was calculated to flow toward the west in 1998 and toward the southwest or south in 1999. Groundwater has consistently flowed toward the north or northwest since the first quarter of 2000 (FREY, 2011a). Depth to groundwater and groundwater sample data have been summarized in Tables 5 and Table 6.

3.8 PHASE I ENVIRONMENTAL SITE ASSESSMENT

FREY prepared Phase I Environmental Site Assessment (ESA) dated March 31, 2011. The Site was originally developed in 1945 and has been owned by the Tedesco family or Tedesco Leasing since that time. The Site has been occupied by various industrial lessees since at least 1951. Various plating company's leased the Site between 1981 and 1990. In 1990, an unauthorized release of a "dark brown liquid" occurred from the north side of the building, entered Mason Street and flowed east to a storm drain. The Los Angeles County Fire Department reported on an inspection form that they observed a leaking plating tank and leaking drums during their inspection on July 13, 1990. It was also reported that 2,000 gallons of liquids were removed as part of the Site clean up. The Site remained vacant from the second half of 1990 to 1997. International Torques has occupied the Site since 2001 (FREY, 2011b).

4.0 CONTAMINANTS OF CONCERN

4.1 SOIL

4.1.1 Volatile Organic Compounds

PCE, TCE, cis 1,2-DCE, methylene chloride and toluene were the only VOCs detected in the 78 soil samples collected from investigations conducted at the Site. PCE is the primary contaminant of concern in soil samples collected from the Site.

PCE was detected in 57 of the 78 soil samples analyzed for VOCs. Five of the soil samples contained PCE in excess of 1 mg/kg at concentrations up to 41 mg/kg. These five soil samples were collected from borings drilled in the immediate vicinity of the former clarifier and collected from depths of 5 feet or less. Sixteen of the 78 soil samples contained PCE at concentrations between 0.1 mg/kg and 1 mg/kg. Concentrations of PCE up to 1 mg/kg were primarily detected in soil samples collected from borings drilled within 10 feet of the clarifier (13 out of the 16 samples). The three remaining soil samples which contained concentrations of PCE up to 1 mg/kg were detected in soil samples collected from borings B2 and B7.

TCE was detected in 11 of the 78 soil samples but in concentrations less than 0.05 mg/kg. Toluene, methylene chloride and cis 1,2-DCE were detected in trace concentrations (less than 0.01 mg/kg) in several soil samples collected from depths of 10 feet or less. The EPA regional screening level for PCE in industrial soils is 2.6 mg/kg

The EPA Regional Screening Level (RSL) for PCE and TCE in industrial soils is 2.6 mg/kg and 1.4 mg/kg, respectively (EPA, 2010). The EPA RSLs for PCE and TCE were developed using soil ingestion as the exposure route.

Conversely, the RWQCB allows for the calculation of a screening level concentration for PCE and TCE based upon depth to water, soil lithology and maximum contaminant levels (RWQCB, 1996 and 2004). The RWQCB screening level concentration is predicated upon the movement of PCE and TCE to groundwater. At the Site, soil screening levels for PCE and TCE range from 0.005 mg/kg (for soil samples collected from depths below 25 feet bgs) to 0.025 mg/kg (for samples collected from depths of 5 feet bgs).

4.1.2 Metals

A total of 86 soil samples have been analyzed for total chromium, 53 soil samples for cadmium, 24 soil samples for hexavalent chromium, 12 soil samples for cyanide and 17 soil samples for nickel. Detected concentrations of total chromium, hexavalent chromium, cyanide, and nickel were below respective California Human Health Screening Levels (CHHSLs) as published by the California Environmental Protection Agency (Cal EPA, 2005).

It should be noted that 21 soil borings have been drilled within the former processing room (approximately 1,000 square feet). A total of 64 soil samples have been analyzed for total chromium, 34 soil samples for cadmium, 15 soil samples for hexavalent chromium, 9 soil samples for cyanide and 12 soil samples have been analyzed for nickel.

Two soil samples (HB-4-5 and FB3) contained 43.1 mg/kg and 8.7 mg/kg of cadmium, respectively, which exceeds the CHHSL level for industrial soils of 7.5 mg/kg. The lateral and vertical extent of soil containing cadmium in excess of 7.5 mg/kg has been adequately assessed.

Soil sample HB-4-5 was collected from a depth 5 feet bgs from boring HB-4, drilled through the center of the former location of the clarifier. Soil borings B8, B9, B10 and B11 were drilled approximately 3 feet to the south, west, north and east of the clarifier, respectively. Soil samples collected from 5, 10 and 15 feet bgs from B8, B9, B10 and B11 did not contain cadmium in concentrations in excess of 0.46 mg/kg

Soil sample FB3 was collected at a depth of 1 foot bgs approximately 17 feet south of the former clarifier. Soil borings B6 and B7 were drilled approximately 7 feet southeast and 3 feet northwest, respectively, from FB3. Soil samples collected from borings B6 and B7 from depths of 2, 5, 10 feet bgs, and 15 feet bgs from B7, contained cadmium at concentrations up to 0.18 mg/kg.

The presence of the soil containing greater than 7.5 mg/kg of cadmium is not considered a significant threat to human health or the environment based on the estimated small volume of impacted soil and its presence beneath four inches of concrete.

4.2 SOIL VAPOR

As mentioned in Section 3.4, two soil vapor samples were collected and analyzed during a short term vapor extraction test conducted in July of 1996. The soil vapor samples were collected from soil vapor extracted from VEW1 and contained PCE, TCE and benzene at concentrations up to 32.8 ppmv, 26.0 ppmv and 1.55 ppmv, respectively. In comparison, the CHHSLs for Commercial /Industrial Land Use as presented by Cal-EPA for PCE, TCE and benzene are 0.089 ppmv, 0.329 ppmv and 0.038 ppmv, respectively (Cal-EPA, 2005).

5.0 OBJECTIVES

The objectives of the scope of work proposed below are to: 1) further assess the lateral and vertical extent of VOCs in soil beneath the Site and immediately off Site, 2) assess the lateral and vertical extent of VOCs in soil vapor beneath the Site and immediately off Site, and; 3) evaluate the potential threat to human health by VOCs to indoor air.

6.0 SCOPE OF WORK

All investigation activities will be performed in accordance with the standards set forth in the Department of Toxic Substance Control's (DTSC) and RWQCB's "Advisory-Active Soil Gas Investigations" dated January 28, 2003 and the DTSC's "Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air" dated December 15, 2004.

6.1 PRE FIELD ACTIVITIES

FREY will obtain encroachment permits from the City of South Gate prior to any field activities. FREY will visit the Site and mark the proposed soil boring/soil vapor probe locations with white paint. The proposed soil boring/soil vapor probe locations will be inspected for accessibility and safety. FREY will obtain an underground service alert number a minimum of 48 hours prior to the advancement of soil borings. A geophysical survey will be conducted to in an effort to identify subsurface obstructions prior to the advancement of soil borings. The health and safety plan attached in Appendix B will guide all field activities. All field activities will be conducted under the supervision of a State of California Professional Geologist.

6.2 ADVANCEMENT AND SAMPLING OF SOIL BORINGS/SOIL VAPOR PROBES

6.2.1 Location of Soil Borings/Soil Vapor Probes

Soil borings VP3 through VP9 will be advanced in the locations shown on Figure 4. Selected soil samples collected during the advancement of VP5 through VP9 will allow for the lateral assessment of VOCs in soil as these borings have been placed at distances of 20, 40 or 80 feet, to the north, south, east and west of the former clarifier. Proposed soil borings VP3 through VP9 will be converted to single soil vapor probes (VP3 and VP4) or multi-depth nested soil vapor probes (VP5 through VP9). The installation of soil vapor probes will facilitate the assessment for the potential for soil vapor intrusion and allow for the lateral assessment of VOCs in soil vapor.

Soil boring VP3 is proposed to be advanced adjacent to the former clarifier. Soil boring VP4 is proposed to be located in the approximate center of the former series of plating tanks, adjacent to the former wastewater conveyance trench, approximately 20 feet to the south of VP3. Soil boring VP5 is proposed to be located at the southern end of the former chemical use and storage area, near the beginning of the former wastewater conveyance trench, approximately 40 feet from the former clarifier. Soil borings VP6, VP7 and VP8 are proposed to be located approximately 40 feet to the west, north and east of the former clarifier. Boring VP9 is proposed to be located in the former buffing area approximately 80 feet south of the former clarifier.

6.2.2 Advancement of Soil Borings and Soil Sample Collection

FREY will hand auger each borehole to 5 feet bgs to locate and avoid subsurface obstructions. Soil borings VP3 and VP4 will be completed at 5 feet bgs. Soil samples will not be collected from borings VP3 based upon the significant number of soil samples previously collected from this area. Soil samples will be collected from VP4 from depths of 2.5 and 5 feet bgs. Soil samples collected from VP4, hand augered in the approximate area of FB3, will be submitted for laboratory analyses to further assess the vertical extent of cadmium in this area.

Soil borings VP5 through VP9 will be advanced to final depths of 45 feet bgs, based on a depth to groundwater of approximately 48 feet bgs, with a direct push drill rig. Soil samples will be collected from VP5 at five foot depth intervals from 25 feet bgs to 45 feet bgs using a combination piston/split barrel sampler. Soil samples will not be collected from VP5 until 25 feet bgs based on previously collected and analyzed soil sample data from borings HB1, HB11, B5 and B12 (all drilled within 10 feet of proposed VP5). Soil samples will be collected from VP6 through VP9 at five foot depth intervals from 5 feet bgs to 45 feet bgs using a combination piston/split barrel sampler.

Soil samples will be collected in accordance with EPA 5035 methodology. The collected soil samples will be placed in an ice chest cooled with ice immediately after sample collection. The samples will be delivered to a State certified hazardous waste testing laboratory within 24 hours of collection. Sample handling, transport, and delivery to the laboratory will be documented using Chain-of-Custody procedures, including the use of Chain-of-Custody forms.

The sampler will be cleaned between sample intervals using a brush and tap water followed by a brush and TSP solution, a tap water rinse, and deionized water rinse. The sampler will be dried with a clean towel prior to sampling.

6.2.3 Construction of Soil Vapor Probes

Soil borings VP3 and VP4 will be converted into permanent soil vapor probes. Soil vapor probes VP3 and VP4 will be constructed of 5 feet of 1/4-inch outer diameter, polyethylene tubing with a vapor implant at the bottom and a vinyl tubing cap placed at the top. Each probe will be clearly labeled with the probe number. The vapor implant will be encased within one vertical foot of machine washed sand placed in the bottom of the borehole. Approximately one vertical foot of bentonite will be placed upon the sand pack and moistened. The remainder of the borehole will be backfilled with granular bentonite. The surface of VP3 and VP4 will be completed by setting a traffic rated well box in concrete.

Soil borings VP5 through VP9 will be converted into multi-depth, nested soil vapor probes with vapor sample implants at depths of 5, 15, 30 and 40 feet bgs. Nested probes will be constructed inside the direct push rods after the completion of soil sampling activities. The bottom of the borehole will be backfilled with moistened bentonite sand to 40 feet bgs. Forty feet of 1/4-inch

outer diameter, polyethylene tubing with a vapor implant at the bottom and a vinyl tubing cap at the top will be placed down the center of the direct push rods. The tubing will be weighted to ensure the tubing is straight. The vapor implant will be encased within one vertical foot of machine washed sand placed in the bottom of the borehole. Bentonite sand will be placed upon the sand pack and moistened. Bentonite sand will extend from 39 feet bgs to 30 feet bgs. This soil vapor probe methodology will be repeated for soil vapor sample implants at depths of 30, 15 and 5 feet bgs. A diagram showing nested soil vapor probe construction details has also been attached in Appendix C

6.2.4 Sampling of Soil Vapor Probes

Previously installed soil vapor probes VP1 and VP2 and proposed soil vapor probes VP3 through VP9 and will be sampled no sooner than 48 hours after the installation of VP3 through VP9. All soil vapor sampling activities will be conducted by a chemist from Baseline On-Site Analysis (Baseline) in accordance with RWQCB and DTSC protocol.

A rag saturated with isopropanol will be placed around the surface of each soil vapor probe as part of leak detection protocol. One, three and seven pore volumes of soil vapor will be extracted from VP3 as part of the purge volume test. The purge volume test is proposed to be conducted on VP3 based on the proximity to the clarifier which is the suspected source of VOCs to the subsurface.

Upon completion of the purge volume test on VP3, Baseline will purge the appropriate number of purge volumes (1, 3 or 7) from each probe depth from VP1 through VP9. Purge rates will not exceed 200 milliliters per minute. Soil vapor samples will be collected from VP1 through VP9 using two 50 milliliter (mL) syringes. The syringes will be immediately transported to an on-Site mobile laboratory provided by Baseline.

6.3 LABORATORY ANALYSES

6.3.1 Soil Samples

Soil samples collected from VP4 from depths of 2.5 and 5 feet bgs will be analyzed for cadmium in accordance with EPA Method No. 6010B.

Soil samples collected from borings VP5 through VP9 will be analyzed for VOCs (full list) in accordance with EPA Method No. 8260B. Soil samples will be analyzed on a 5-day turnaround.

6.3.2 Soil Vapor Samples

Soil vapor samples collected from soil vapor probes VP1 through VP9 will be analyzed for VOCs (full list) in accordance with EPA Method No. 8260B. Soil vapor samples will be analyzed on Site, immediately after sample collection.

6.4 REPORT

FREY will prepare a report documenting soil and soil vapor sampling activities. The report will contain the following sections: an introduction, soil sampling procedures, laboratory data, and a discussion of results. Boring logs and figures (including cross sections) portraying the lateral extent of soil containing PCE will be included in the report. In addition, the report will evaluate the threat to human health from VOC vapor intrusion in accordance with DTSC published criteria.

7.0 SCHEDULE

FREY is prepared to commence work within 2 weeks of written approval of this workplan by the RWQCB. Two weeks will be required to obtain encroachment permits from the City of South Gate. Field activities are estimated to require between 3 and 4 days to complete. Laboratory analyses will require between 4 and 6 days to complete. A report can be submitted approximately 14 weeks following workplan approval.

Should you have any questions regarding this workplan, please contact us at (949) 723-1645.

Joe Frey
Principal
Certified Engineeri

CEG #1500

Evan Privett

Senior Project Geologist

PG#7880

8.0 REFERENCES

Applied Geosciences Inc., 1991, Site Assessment and Mitigation Workplan for the Property Located at 4933 Firestone Boulevard, South Gate, California dated April 5, 1991 , 1992a, Laboratory Results of a Preliminary Subsurface Investigation for the Property at 4933 Firestone Boulevard, South Gate, California dated June 25, 1992 Located , 1992b, Site Characterization of the Former Mondo's Show Chrome Facility in the City of South Gate, California dated November 3, 1992 Cal-EPA (California Environmental Protection Agency), 2005, Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties, January 2005. DWR (Department of Water Resources), 1961, Planned utilization of the ground water basins of the coastal plain of Los Angeles County: State of California Department of Water Resources, Bulletin No. 104, June 1961, 181 p. EPA (Environmental Protection Agency), 2010, Regional Screening Level Summary Table November 2010 FREY Environmental, Inc. 1996, Limited Subsurface Soil Investigation and Vapor Extraction Test, Former Mondo Chrome Facility, 4933 Firestone Boulevard, South Gate, California dated December 16, 1996. , 1999, Groundwater Monitoring Well Installation and Sampling, Former Mondo Chrome Facility, 4933 Firestone Boulevard, South Gate, California dated January 8, 1999. , 2001, Additional Soil and Groundwater Investigation, Former Mondo Chrome Facility, 4933 Firestone Boulevard, South Gate, California dated November 18, 2001. , 2011a, Groundwater Monitoring Well Sampling and Site Status Update, Third Quarter 2011, Former Mondo Chrome Facility, 4933 Firestone Boulevard, South Gate, California dated October 25, 2011. _, 2011b, Phase I Environmental Site Assessment, Former Mondo Chrome Facility, 4933 Firestone Boulevard, South Gate, California dated March 31, 2011. RWQCB (Regional Water Quality Control Board), 1996, Interim Site Assessment & Cleanup Guidebook, May 1996, Table 5-1

South Gate, 2000, fax from Ron Hernandez dated October 24, 2000

TABLES

TABLE 1 CHEMICAL ANALYSES OF SOIL SAMPLES - VOCS

Former Mondo Chrome Facility 4933 Firestone Boulevard

South Gate, California (soil - milligrams per kilogram)

Boring Number	Depth (feet bgs)	Date Sampled	PCE	TCE	Cis 1,2-DCE	Methylene Chloride	Toluene
HB-1	2	04/23/1992	0.040	ND<0.005	ND<0.005	ND<0.005	ND<0.005
1115 1	5	04/23/1992	0.040	ND<0.005	ND<0.005	ND<0.005	ND<0.005
	10	04/23/1992	0.030	ND<0.005	ND<0.005	ND<0.005	ND<0.005
HB-2	2	04/23/1992					
HB-3	2	04/23/1992					
1115-5	5	04/23/1992				~~~	
	10	04/23/1992					
	10	04/23/1992					
HB-4	5	04/23/1992	0.470	ND<0.005	ND<0.005	ND<0.005	ND<0.005
	10	04/23/1992	0.030	ND<0.005	ND<0.005	0.007	ND<0.005
	15	04/23/1992	0.020	ND<0.005	ND<0.005	0.007	ND<0.005
HB-5	2	04/23/1992	0.240	ND<0.005	ND<0.005	0.009	ND<0.005
	5	04/23/1992	41.000	ND<0.005	ND<0.005	*****	ND<0.005
	10	04/23/1992	0.020	ND<0.005	ND<0.005	0.008	ND<0.005
	15	04/23/1992	ND<0.005	ND<0.005	ND<0.005	0.01	ND<0.005
	13	04/25/1772	112 (0.003	1112 (0.003	11D <0.005	0.01	1112 (0.003
HB-6	1	04/23/1992	0.051	ND<0.005	ND<0.005	0.01	ND<0.005
	5	04/23/1992	0.006	ND<0.005	ND<0.005	0.006	ND<0.005
	10	04/23/1992	0.030	ND<0.005	ND<0.005	0.007	ND<0.005
HB-7	1	04/23/1992	ND<0.005	ND<0.005	ND<0.005	0.006	ND<0.005
	5	04/23/1992	ND<0.005	ND<0.005	ND<0.005	0.007	ND<0.005
	10	04/23/1992	0.008	ND<0.005	ND<0.005	0.007	ND<0.005
HB-8	2	Oct - 1992			***	~~~	
1115-6	5	Oct - 1992 Oct - 1992					
	10	Oct - 1992 Oct - 1992					
HB-9	2	Oct - 1992					
	5	Oct - 1992					
	10	Oct - 1992					
HB-10	2	Oct - 1992					
	5	Oct - 1992					
	10	Oct - 1992					
HB-11	2	Oct - 1992	0.077	ND<0.001	ND<0.001	ND<0.001	ND<0.001
1110-11	5	Oct - 1992 Oct - 1992	0.077	ND<0.001 ND<0.001	ND<0.001 ND<0.001	ND<0.001	ND<0.001 ND<0.001
	10	Oct - 1992 Oct - 1992	0.004	0.003	ND<0.001 ND<0.001	ND<0.001 ND<0.001	ND<0.001 ND<0.001
	15						
	13	Oct - 1992	0.072	0.003	ND<0.001	ND<0.001	ND<0.001
B-1	2	Oct - 1992	0.010	ND<0.001	ND<0.001	ND<0.001	0.006
	5	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
	10	Oct - 1992	0.030	ND<0.001	ND<0.001	ND<0.001	ND<0.001

TABLE 1 CHEMICAL ANALYSES OF SOIL SAMPLES - VOCS

Former Mondo Chrome Facility 4933 Firestone Boulevard South Gate, California

(soil - milligrams per kilogram)

Boring Number	Depth (feet bgs)	Date Sampled	PCE	TCE	Cis 1,2-DCE	Methylene Chloride	Toluene
B-2	2	Oct - 1992	0.100	ND<0.001	ND<0.001	ND<0.001	0.010
D-2	5	Oct - 1992	0.100	ND<0.001 ND<0.001	ND<0.001 ND<0.001	ND<0.001 ND<0.001	ND<0.001
	10	Oct - 1992	0.020	ND<0.001 ND<0.001	ND<0.001 ND<0.001	ND<0.001 ND<0.001	0.006
	15	Oct - 1992 Oct - 1992	0.140				0.008
	20			ND<0.001	ND<0.001	ND<0.001	
	20	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
B-3	2	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
	5	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
	10	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
D 4	2	Oat 1002					
B-4	2	Oct - 1992					
	5	Oct - 1992					
B-5	2	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
	5	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
	10	Oct - 1992	0.010	ND<0.001	ND<0.001	ND<0.001	0.008
B-6	2	Oct - 1992	0.057	ND<0.001	ND<0.001	ND<0.001	0.009
Б-0	5	Oct - 1992 Oct - 1992	ND<0.001	ND<0.001 ND<0.001	ND<0.001 ND<0.001	ND<0.001 ND<0.001	0.009 ND<0.001
	10	Oct - 1992 Oct - 1992	0.077	ND<0.001 ND<0.001		ND<0.001 ND<0.001	ND<0.001 ND<0.001
	10	Oct - 1992	0.077	ND~0.001	ND<0.001	ND~0.001	ND~0.001
B-7	2	Oct - 1992	0.008	ND<0.001	ND<0.001	ND<0.001	ND<0.001
	5	Oct - 1992	0.050	ND<0.001	ND<0.001	ND<0.001	0.008
	10	Oct - 1992	0.150	ND<0.001	ND<0.001	ND<0.001	ND<0.001
	15	Oct - 1992	ND<0.001	ND<0.001	ND<0.001	ND<0.001	ND<0.001
B-8	2	Oct - 1992	12.000	ND<0.005	ND<0.005	ND<0.005	
D-0	5	Oct - 1992	ND<0.005	ND<0.005	ND<0.005	ND<0.005	
	10	Oct - 1992	0.066	ND<0.005	ND<0.005	ND<0.005	
	15	Oct - 1992	0.360	ND<0.005	ND<0.005	ND<0.005	
	20	Oct - 1992	0.500		1125 -0.003		
	25	Oct - 1992					
B-9	2	Oct - 1992	3.800	ND<0.005	ND<0.005	ND<0.005	
	5	Oct - 1992	0.018	ND<0.005	ND<0.005	ND<0.005	
	10	Oct - 1992	0.036	ND<0.005	ND<0.005	ND<0.005	
	15	Oct - 1992	0.130	ND<0.005	ND<0.005	ND<0.005	
B-10	2	Oct - 1992	4.300	ND<0.005	ND<0.005	ND<0.005	
	5	Oct - 1992	0.180	ND<0.005	ND<0.005	ND<0.005	
	10	Oct - 1992	0.066	ND<0.005	ND<0.005	ND<0.005	
	15	Oct - 1992	0.200	ND<0.005	ND<0.005	ND<0.005	
B-11	2	Oct - 1992	3.000	NID-0 005	NIT>-0.005	NIT><0.005	
D-11	2 5	Oct - 1992 Oct - 1992	2.900	ND<0.005 ND<0.005	ND<0.005 ND<0.005	ND<0.005 ND<0.005	
	10	Oct - 1992 Oct - 1992	0.017	ND<0.005	ND<0.005	ND<0.005	
	15	Oct - 1992 Oct - 1992	0.480	ND<0.005 ND<0.005	ND<0.005 ND<0.005	ND<0.005 ND<0.005	
	20	Oct - 1992 Oct - 1992	0.480	ND<0.003 ND<0.005	ND<0.003 ND<0.005	ND<0.005	
	30	Oct - 1992 Oct - 1992	0.500	ND<0.005 ND<0.005	ND<0.005 ND<0.005	ND<0.005	
	40	Oct - 1992 Oct - 1992	0.003	ND<0.005	ND<0.005	ND<0.005	
	4 €	Oct - 1992	0.003	1117~0.003	1117~0.003	MD>0.003	

TABLE 1 CHEMICAL ANALYSES OF SOIL SAMPLES - VOCS

Former Mondo Chrome Facility 4933 Firestone Boulevard

South Gate, California (soil - milligrams per kilogram)

Boring Number	Depth (feet bgs)	Date Sampled	PCE	TCE	Cis 1,2-DCE	Methylene Chloride	Toluene
						1.77	
B-12	15	Oct - 1992	0.015	ND<0.005	ND<0.005	ND<0.005	
	20	Oct - 1992	0.007	ND<0.005	ND<0.005	ND<0.005	
FB1	1	06/27/1996					
FB2	1	06/27/1996					
FB3	1	06/27/1996					04.00.00
FB4	1	06/27/1996					
FB5	1	06/27/1996				~~	
VEW1-5	5	06/27/1996	ND<0.005	ND<0.005	ND<0.005	ND<0.005	
VEW1-15	15	06/27/1996	0.054	ND<0.005	ND<0.005	ND<0.005	
VEW1-15	25	06/27/1996	0.212	0.013	ND<0.005	ND<0.005	
VEW 1-25	35	06/27/1996	ND<0.005	ND<0.005	ND<0.005	ND<0.005	
VEW1-35	45	06/27/1996	0.021	0.014	ND<0.005	ND<0.005	
VEW1-50	50	06/27/1996	0.021	0.07	ND<0.005	ND<0.005	
VEW 1-30	50	00/27/1990	0.082	0.07	1VD <0.005	ND <0.003	
MW1-15	15	11/23/1998	0.515	0.033	ND<0.005	ND<0.005	
MW1-25	25	11/23/1998	0.315	0.023	ND<0.005	ND<0.005	
MW1-30	30	11/23/1998	0.089	0.040	ND<0.005	ND<0.005	
MW1-35	35	11/23/1998	0.010	ND<0.005	ND<0.005	ND<0.005	
B16-20	20	08/07/2001					
B16-30	30	08/07/2001					
B16-40	40	08/07/2001					
B16-50	50	08/07/2001					
B16-55	55	08/07/2001	ND<0.005	ND<0.005	ND<0.005	ND<0.005	
B16-60	60	08/07/2001	ND<0.005	0.014	ND<0.005	ND<0.005	
B16-65	65	08/07/2001	ND<0.005	0.024	ND<0.005	ND<0.005	
B16-70	70	08/07/2001	ND<0.005	ND<0.005	ND<0.005	ND<0.005	
B16-75	75	08/07/2001	ND<0.005	ND<0.005	ND<0.005	ND<0.005	
B16-100	100	08/07/2001	ND<0.005	ND<0.005	ND<0.005	ND<0.005	
D15 **	20	0.6/0.0/0.004					
B17-20	20	06/29/2001					
B17-25	25	06/29/2001					
B17-30	30	06/29/2001					
B17-35	35	06/29/2001					
B17-40	40	06/29/2001					
B18-20	20	06/29/2001					
B18-25	25	06/29/2001					
B18-30	30	06/29/2001					
B18-35	35	06/29/2001					
B18-40	40	06/29/2001			***		

Notes:

- Tetrachloroethene (PCE), trichloroethene (TCE), cis 1,2-dichloroethene (cis 1,2-DCE), methylene chloride and toluene analyzed in general accordance with EPA Method No. 8010 or 8260B. Only detected compounds have been listed.
- Total chromium and cadmium analyzed in general accordance with EPA Method No. 6010B.
- 3 Hexavalent chromium analyzed in general accordance with EPA Method Nos. 7196 or 7199.
- Total organic carbon analyzed in general accordance with EPA Method Nos. 9060.
- 5 ---- = Not Analyzed, ND = Not detected above laboratory detection limit

FORMER MONDO CHROME FACILITY 4933 FIRESTONE BOULEVARD SOUTH GATE, CALIFORNIA

Boring Number	Depth (feet bgs)	Date Sampled	Total Chromium (mg/kg)	Soluble Chromium (mg/L)	Chromium VI (mg/kg)	Soluble Chromium IV (mg/L)	Cadmium (mg/kg)	Cyanide (mg/kg)	Nickel (mg/kg)	Total Organic Carbon (mg/kg)	pН
HB-1	2	04/23/1992	18.2		***		20 00 to			20.000	8.7
	5	04/23/1992	14.1		***		***			***	8.7
	10	04/23/1992	15.7								8.8
HB-2	2	04/23/1992	195	10.7							9.0
HB-3	2	04/23/1992	75.7	2.9							9.3
	5	04/23/1992	235	6.5			0.06				9.0
	10	04/23/1992	158	6.1							9.4
HB-4	5	04/23/1992	137	6.6			43.1				9.1
	10	04/23/1992	67.8	3.4							8.6
	15	04/23/1992	45								9.0
HB-5	2	04/23/1992	45.8								10.1
	5	04/23/1992	124	1.8							9.1
	10	04/23/1992	38.6		***					***	8.9
	15	04/23/1992	22.4							***	9.6
HB-6	1	04/23/1992	57.2	1.7							8.5
	5	04/23/1992	11.5		-					W1 PM SW	9.0
	10	04/23/1992	18.2								9.1
HB-7	1	04/23/1992	149	12.9				***			8.3
	5	04/23/1992	95.4	8.6							8.5
	10	04/23/1992	17.8								9.0
HB-8	2	Oct - 1992	20.9				0.14				
	5	Oct - 1992	32.1				0.07				
	10	Oct - 1992	22.7				0.13				
HB-9	2	Oct - 1992	14.5								
	5	Oct - 1992	12.6				0.11				
	10	Oct - 1992	35.4				0.25				
HB-10	2	Oct - 1992	102	4.2		~~~	0.43				
	5	Oct - 1992	42.8				ND			***	
	10	Oct - 1992	16				0.21				

FORMER MONDO CHROME FACILITY 4933 FIRESTONE BOULEVARD SOUTH GATE, CALIFORNIA

Boring Number	Depth (feet bgs)	Date Sampled	Total Chromium (mg/kg)	Soluble Chromium (mg/L)	Chromium VI (mg/kg)	Soluble Chromium IV (mg/L)	Cadmium (mg/kg)	Cyanide (mg/kg)	Nickel (mg/kg)	Total Organic Carbon (mg/kg)	рН
HB-11	2	Oct - 1992					10 OR 100	***		***	
	5	Oct - 1992			***			***		20 ON 103	
	10	Oct - 1992									
	15	Oct - 1992									
B-1	2	Oct - 1992	10.8				0.06	ND	3.73		7.4
	5	Oct - 1992	11				0.06	ND	6.22		7.6
	10	Oct - 1992	21.4				0.006	ND	11.6		8.1
B-2	2	Oct - 1992	399	18.1	7.1	0.59	0.14	ND	8.1		8.6
	5	Oct - 1992	116	3.4			0.19	ND	9.9		8.4
	10	Oct - 1992	126	4.4	21		0.23	ND	13.8		8.3
	15	Oct - 1992	162	6.9		4.2					
	20	Oct - 1992	71	2.6							
B-3	2	Oct - 1992	9.2				0.06	ND	7.6	20 (200)	
	5	Oct - 1992	10.3				0.24	ND	8	30 GHD	
	10	Oct - 1992	13		***		0.1	ND	9.48	20 (200)	
B-4	2	Oct - 1992	NA		~~~				5.28	****	8.2
	5	Oct - 1992	NA						9.9	-	9.5
B-5	2	Oct - 1992	8.8				0.03	ND	6.55		9.6
	5	Oct - 1992	9.4			***	0.09	ND	7.4		8.2
	10	Oct - 1992	15.2			***	0.13	ND	10.9	***	8.2
B-6	2	Oct - 1992	10.5				0.18		7.3	***	
	5	Oct - 1992	9				ND		7.01		
	10	Oct - 1992	13.8				0.04		11.9	***	
B-7	2	Oct - 1992	52	2.3			ND				
	5	Oct - 1992	28.7				ND				
	10	Oct - 1992	26.2				0.1				
	15	Oct - 1992	15.5				0.04				
B-8	2	Oct - 1992			~~~						
	5	Oct - 1992	32.4				0.05				
	10	Oct - 1992	83.1	6.2		4.9	0.17				
	15	Oct - 1992	143	5.2		1.2	0.13				
	20	Oct - 1992	22	***				-		60 NO GE	
	25	Oct - 1992	24			===				□ □ □	

FORMER MONDO CHROME FACILITY 4933 FIRESTONE BOULEVARD SOUTH GATE, CALIFORNIA

Boring Number	Depth (feet bgs)	Date Sampled	Total Chromium (mg/kg)	Soluble Chromium (mg/L)	Chromium VI (mg/kg)	Soluble Chromium IV (mg/L)	Cadmium (mg/kg)	Cyanide (mg/kg)	Nickel (mg/kg)	Total Organic Carbon (mg/kg)	рН
B-9	2	Oct - 1992	000 K		***					20 0000	***
D /	5	Oct - 1992	69.3	4.1	***		0.46				
	10	Oct - 1992	43				0.23				
	15	Oct - 1992	38.4				0.13				
B-10	2	Oct - 1992	Man 24								
	5	Oct - 1992	77.3	4.4			0.09				
	10	Oct - 1992	50.8	1.7			0.23				
	15	Oct - 1992	85.3	2.4			ND				
B-11	2	Oct - 1992	M178 ET								
	5	Oct - 1992	40.9				ND				
	10	Oct - 1992	24.8				ND				
	15	Oct - 1992	31.6				0.17				
	20	Oct - 1992									
	30	Oct - 1992									
	40	Oct - 1992								***	
B-12	15	Oct - 1992									
	20	Oct - 1992									
FB1	1	06/27/1996	15.1		ND<0.2		3.6				
FB2	1	06/27/1996	14.2		ND<0.2		2.3				
FB3	1	06/27/1996	69.6		ND<0.2	***	8.7				
FB4	1	06/27/1996	110		ND<0.2		2.7				
FB5	1	06/27/1996	56.9		ND<0.2		2.4				
VEW1-5	5	06/27/1996									
VEW1-15	15	06/27/1996									
VEW1-25	25	06/27/1996									
VEW1-35	35	06/27/1996									
VEW1-45	45	06/27/1996									
VEW1-50	50	06/27/1996									
MW1-15	15	11/23/1998	PE 80 PF		***						
MW1-25	25	11/23/1998									
MW1-30	30	11/23/1998									
MW1-35	35	11/23/1998									

FORMER MONDO CHROME FACILITY 4933 FIRESTONE BOULEVARD SOUTH GATE, CALIFORNIA

Boring Number	Depth (feet bgs)	Date Sampled	Total Chromium (mg/kg)	Soluble Chromium (mg/L)	Chromium VI (mg/kg)	Soluble Chromium IV (mg/L)	Cadmium (mg/kg)	Cyanide (mg/kg)	Nickel (mg/kg)	Total Organic Carbon (mg/kg)	pН
D1 6 00	20	00/05/0001	NT -0.005		h Tro 0 001		NTD <0.000			100	
B16-20	20	08/07/2001	ND<0.005		ND<0.001		ND<0.005	***		190	
B16-30	30	08/07/2001	ND<0.005		ND<0.001		ND<0.005			450	
B16-40	40	08/07/2001	ND<0.005		ND<0.001		ND<0.005			280	
B16-50	50	08/07/2001								590	
B16-55	55	08/07/2001	14.9		0.120		ND<0.5				
B16-60	60	08/07/2001									
B16-65	65	08/07/2001	16.4		0.079		ND<0.5				
B16-70	70	08/07/2001									
B16-75	75	08/07/2001	8.57		0.150		ND<0.5			ND<40	
B16-100	100	08/07/2001	7.59		0.140		ND<0.5			42	
B17-20	20	06/29/2001	14.6		ND<1.0						
B17-25	25	06/29/2001	58		ND<1.0						
B17-30	30	06/29/2001	175		18.1						
B17-35	35	06/29/2001	10.9		6.60						
B17-40	40	06/29/2001	14.3		ND<1.0						
B18-20	20	06/29/2001	87.2		ND<1.0						
B18-25	25	06/29/2001	142		ND<1.0						
B18-30	30	06/29/2001	21.1		ND<1.0						
B18-35	35	06/29/2001	11.5		ND<1.0						
B18-40	40	06/29/2001	19.6		ND<1.0						
CHHSL Indu EPA RSL fo	ustrial Soils r Industrial So	oils	100,000	000000000000000000000000000000000000000	37	***************************************	7.5	2,000	16,000	***************************************	***************************************

Notes

- Total chromium and cadmium analyzed in general accordance with EPA Method No. 6010B. Hexavalent chromium analyzed in general accordance with EPA Method Nos. 7196 or 7199.
- Total organic carbon analyzed in general accordance with EPA Method Nos. 9060.
- 3 --- = Not Analyzed, ND = Not detected above laboratory detection limit
- 4 For samples B16-20, B16-30 and B16-40 concentrations of total chromium, cadmium and hexavalent chromium values are for synthetic precipatation leaching potential as analyzed in accordance with EPA 6010B or 7199.

TABLE 3 CHEMICAL ANALYSES OF VAPOR SAMPLES DURING VAPOR EXTRACTION TESTING

Former Mondo Chrome Facility 4933 Firestone Boulevard South Gate, California

(vapor - (v/v) parts per billion - unless otherwise noted)

SAMPLE NUMBER	DATE SAMPLED	PCE [1]	TCE [2]	BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES	1,1-DCE [3]	Cis 1,2-DCE [4]	4-ETHYL TOLUENE	1,2,4-TRIMETHYL BENZENE
VS1	07/16/1996	31,000	25,400	1,550	6,990	430	3,650	400	360	220	420
VS2	07/16/1996	32,800	26,000	1,320	6,310	550	7,460	180	350	840	1,290

Notes:

- 1 PCE = Tetrachloroethene
- 2 TCE = Trichloroethene
- 3 1,1-DCE = 1,1-Dichloroethene
- 4 Cis 1,2-Dichloroethene
- 5 The vapor samples were analyzed in accordance with EPA Method No. TO-14. Only detected analytes have been listed.

TABLE 4 SOIL BORING GROUNDWATER SAMPLE RESULTS

Former Mondo Chrome 4933 Firestone Boulevard South Gate, California

Sample No.	Date Sampled	Sample Depth (feet bgs)	PCE ug/L (ppb)	TCE ug/L (ppb)	cis-1,2-DCE ug/L (ppb)	1,1-DCE ug/L (ppb)	Vinyl Chloride ug/L (ppb)	Total Chromium ug/L (ppb)	Chromium VI ug/L (ppb)	Cadmium ug/L (ppb)
B12	06/28/2001	40	258	453	3.4	1.7	ND<1.0	430	ND<0.5	60
B13	06/29/2001	40	ND<10	180	14	ND<16.0	ND<10.0		ND<0.5	
B15	06/28/2001	40	16.9	290	9.6	0.7	ND<0.5		ND<0.5	
B16-70 B16-100	08/07/2001 08/07/2001	70 100	82 44	710 290	ND<10 ND<10	ND<10 ND<10	ND<5.0 ND<5.0		ND<1.0 ND<1.0	
B17	06/29/2001	40	305	668	ND<10	ND<16.0	ND<10.0	9,270	ND<0.5	ND<300
DHS MCI	Ls		5	5	6	6	0.5	50		5

<u>Notes</u>

- 1 Groundwater samples collected from direct push boreholes.
- Well elevation recorded at top of casing.
- PCE = Tetrachloroethene, TĈE = trichloroethene, cis 1,2-DCE = cis 1,2-Dichloroethene, and 1,1-DCE = 1,1-Dichloroethene analyzed in accordance with EPA Method No. 8021B
- Total chromium and cadmium analyzed in general accordance with EPA Method No. 6010B.
- 5 Hexavalent chromium analyzed in general accordance with EPA Method No. 7196 or 7199.
- 6 Maximum Contaminant Levels (MCLs) are enforceable drinking water standards set by the California Department of Health Services.
- 7 ND< constituent not detected above the stated concentration
- 8 NA Not analyzed
- 9 ---- = A sufficient volume of groundwater could not be collected for the noted analyses.

TABLE 5
Groundwater Levels and Chemical Analyses
Former Mondo Chrome Facility
4933 Firestone Boulevard
South Gate, California

Well	Well	Date	Depth to	Groundwater			cis-1,2-	trans-1,2-		Vinyl			1,4-
Number	Elevation	Sampled	Groundwater	Elevation	PCE	TCE	DCE	DCE	1,1-DCE	chloride	1,2-DCA	1,2,3-TCP	Dioxane
	(ft-msl)		(feet)	(ft-msl)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(μg/L)	(µg/L)
	100.40	1.0 10 11 1 1 1 1 1 1	41.50	CT 02	440	1.10		37.4	NTD 4.0	NTD 10	3.77	274	3.7.4
MW1	109.40	12/07/1998	41.58	67.82	110	140	6.8	NA	ND<1.0	ND<1.0	ND<0.5	NA	NA
		03/03/1999	40.71	68.69	140	190	ND<10	NA	ND<16	ND<20	ND<10	NA	NA
screen		06/24/1999	40.36	69.04	600	780	ND<25	NA	ND<40	ND<50	ND<25	NA	NA
interval		09/17/1999	40.31	69.09	707	824	9.4	NA	1.9	1.9	ND<0.5	NA	NA
(feet-bgs)		12/20/1999	40.35	69.05	395	635	10	NA	1.6	ND<1.0	ND<0.5	NA	NA
30-55		03/28/2000	40.42	68.98	368	538	11	NA	1.9	ND<1.0	ND<0.5	NA	NA
		06/26/2000	40.50	68.90	663	909	125	NA	ND<0.8	ND<1.0	ND<0.5	NA	NA
		09/22/2000	40.55	68.85	111	150	ND<0.5	NA	2.49	ND<1.0	ND<0.5	NA	NA
		12/18/2000	41.78	67.62	616	116	14	2.1	1.4	ND<1.0	ND<0.5	NA	NA
		03/05/2001	40.90	68.50	670	330	11	2.2	2.7	3.4	0.65	NA	NA
		06/04/2001	40.88	68.52	420	800	12	ND<0.8	1.6	ND<1.0	ND<1.0	NA	NA
		09/24/2001	41.28	68.12	430	890	17	ND<10	ND<10	ND<10	ND<5.0	NA	NA
		12/13/2001	41.71	67.69	420	890	12	ND<1.0	1.9	ND<1.0	ND<0.50	NA	NA
		03/27/2002	41.70	67.70	590	980	18	ND<5.0	ND<5.0	ND<5.0	ND<2.5	NA	NA
		10/30/2002	41.72	67.68	500	880	12	ND<10	ND<10	ND<5.0	ND<5.0	NA	NA
		05/06/2003	43.18	66.22	640	1,000	17	ND<10	ND<10	ND<5.0	ND<5.0	NA	NA
		11/07/2003	43.54	65.86	510	820	15	ND<1.0	2.3	0.90	ND<0.50	NA	NA
		03/14/2008	43.58	65.82	310	560	13	ND<1.0	ND<1.0	ND<0.50	ND<0.50	ND<5.00	5.8
		03/18/2011	48.34	61.06	26	250	48	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA
		06/20/2011	48.49	60.91	38	660	86	4.6	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA
		09/22/2011	48.61	60.79	3.9	130	58	1.6	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA

TABLE 5
Groundwater Levels and Chemical Analyses
Former Mondo Chrome Facility
4933 Firestone Boulevard
South Gate, California

Well Number	Well Elevation	Date Sampled	Depth to Groundwater	Groundwater Elevation	PCE	TCE	cis-1,2- DCE	trans-1,2- DCE	1,1-DCE	Vinyl chloride	1,2-DCA	1,2,3-TCP	1,4- Dioxane
	(ft-msl)		(feet)	(ft-msl)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(μg/L)	(μg/L)	(µg/L)
MW2	109.45	12/07/1998	41.68	67.77	11	77	16	NA	ND<1.0	ND<1.0	ND<0.5	NA	NA
		03/03/1999	40.81	68.64	6.5	130	13	NA	ND<4	ND<5	ND<2.5	NA	NA
screen		06/24/1999	40.45	69.00	20	160	13	NA	ND<8	ND<10	ND<5	NA	NA
interval		09/17/1999	40.40	69.05	15	156	21	NA	ND<0.8	ND<1	ND<0.5	NA	NA
(feet-bgs)		12/20/1999	40.43	69.02	27	158	18	NA	ND<0.8	ND<1.0	ND<0.5	NA	NA
30-55		03/28/2000	40.38	69.07	8.4	138	27	NA	0.8	ND<1.0	ND<0.5	NA	NA
		06/26/2000	40.46	68.99	17	101	230	NA	ND<0.8	ND<1.0	ND<0.5	NA	NA
		09/22/2000	40.47	68.98	3.79	72.6	ND<0.5	NA	ND<0.8	ND<1.0	ND<0.5	NA	NA
		12/18/2000	41.70	67.75	12	92	28	2.1	ND<0.8	ND<1.0	ND<0.5	NA	NA
		03/05/2001	40.83	68.62	7.1	50	19	2.2	1.3	1.2	ND<0.5	NA	NA
		06/04/2001	40.71	68.74	3.0	86	24	ND<0.8	ND<0.8	ND<1.0	ND<0.5	NA	NA
		09/24/2001	41.11	68.34	3.1	94	45	ND<10	ND<1.0	ND<1.0	ND<0.50	NA	NA
		12/13/2001	41.49	67.96	2.9	98	34	ND<1.0	ND<1.0	ND<1.0	ND<0.50	NA	NA
		03/27/2002	41.40	68.05	4.1	120	46	1.1	ND<1.0	ND<1.0	ND<0.50	NA	NA
		10/30/2002	41.43	68.02	5.0	90	62	1.3	ND<1.0	ND<0.50	ND<0.50	NA	NA
		05/06/2003	42.76	66.69	2.9	97	53	1.4	ND<1.0	ND<0.50	ND<0.50	NA	NA
		11/07/2003	43.26	66.19	3.3	90	52	1.2	ND<1.0	ND<0.50	ND<0.50	NA	NA
		03/14/2008	43.22	66.23	2.2	68	43	ND<1.0	ND<1.0	ND<0.50	ND<0.50	ND<5.00	ND<2.0
		03/18/2011	47.73	61.72	1.8	4.9	14	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA
		06/20/2011	47.88	61.57	ND<1.0	12	24	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA
		09/22/2011	48.10	61.35	ND<1.0	5.2	9.6	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA

TABLE 5
Groundwater Levels and Chemical Analyses
Former Mondo Chrome Facility
4933 Firestone Boulevard
South Gate, California

Well Number	Well Elevation (ft-msl)	Date Sampled	Depth to Groundwater (feet)	Groundwater Elevation (ft-msl)	PCE (μg/L)	TCE (µg/L)	cis-1,2- DCE (μg/L)	trans-1,2- DCE (μg/L)	1,1-DCE (μg/L)	Vinyl chloride (µg/L)	1,2-DCA (μg/L)	1,2,3-TCP (μg/L)	1,4- Dioxane (μg/L)
***************************************	(11 11101)			(10 11151)	(Mg/2)	(Mg/ 22)	(PB/25)	<u> </u>	J-8/2-1	(198, 23)	V-8'	(PS) 3)	(25,27)
MW3	109.61	12/07/1998	41.78	67.83	9.3	75	10	NA	1.7	ND<1.0	ND<0.50	NA	NA
		03/03/1999	40.94	68.67	5.1	100	6.4	NA	ND<4	ND<5	ND<2.5	NA	NA
screen		06/24/1999	40.59	69.02	7.4	110	7.3	NA	ND<8	ND<10	ND<5	NA	NA
interval		09/17/1999	40.56	69.05	6.1	145	12	NA	1.2	2.3	1.2	NA	NA
(feet-bgs)		12/20/1999	40.61	69.00	4.4	43	3.6	NA	ND<0.8	ND<1.0	ND<0.5	NA	NA
30-55		03/28/2000	40.54	69.07	4.7	114	13	NA	1.7	ND<1.0	0.9	NA	NA
		06/26/2000	40.61	69.00	26	92	ND<0.5	NA	ND<0.8	ND<1.0	ND<0.50	NA	NA
		09/22/2000	40.60	69.01	7.11	66	4.97	NA	1.61	ND<1.0	ND<0.50	NA	NA
		12/18/2000	41.85	67.76	11	80	13	1.9	1.1	ND<1.0	ND<0.50	NA	NA
		03/05/2001	40.90	68.71	7	47	11	2	2.2	1.4	1.2	NA	NA
		06/04/2001	40.86	68.75	2.4	56	9.2	ND<0.8	0.85	ND<1.0	ND<0.50	NA	NA
		09/24/2001	41.20	68.41	2.5	72	17	ND<1.0	1.4	ND<1.0	1.0	NA	NA
		12/13/2001	41.48	68.13	3.1	67	11	ND<1.0	1.3	ND<1.0	ND<0.50	NA	NA
		03/27/2002	41.42	68.19	3.4	80	14	ND<1.0	1.7	ND<1.0	1.0	NA	NA
		10/30/2002	41.44	68.17	13	72	18	ND<1.0	1.2	ND<0.50	ND<0.50	NA	NA
		05/06/2003	42.86	66.75	3.5	63	12	ND<1.0	1.5	ND<0.50	0.66	NA	NA
		11/07/2003	43.36	66.25	1.5	61	13	ND<1.0	1.5	0.59	ND<0.50	NA	NA
		03/14/2008	43.43	66.18	1.2	49	25	ND<1.0	ND<1.0	ND<0.50	ND<0.50	ND<5.00	ND<2.0
		03/18/2011	48.11	61.50	9.8	27	13	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA
		06/20/2011	48.25	61.36	4.5	19	21	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA
		09/22/2011	48.47	61.14	2.5	13	19	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	NA
DHS MCL:	s				5	5	6	0.8	6	0.5	0.5		

notes:		PCE	tetrachloroethene
[1]	well elevation recorded at top of casing	TCE	trichloroethene
[2]	maximum contaminant levels (MCLs) are enforceable drinking water standards	cis-1,2-DCE	cis-1,2 dichloroethene
[3]	Trichlorobenzene 1,2,3 and 1,2,4 detected at concentrations of 1.1 μg/L and 1.0 μg/L, respectively,	trans-1,2-DCE	trans-1,2 dichloroethene
	in sample from well MW3 on 05/06/03.	1,1-DCE	1,1-dichloroethene
ND	constituent not detected above the stated concentration	1,2-DCA	1,2-dichloroethane
NA	not analyzed	1,2,3-TCP	1,2,3-Trichloropropane

TABLE 6
Summary of Additional Chemical Analyses of Groundwater Samples
Former Mondo Chrome Facility
4933 Firestone Boulevard
South Gate, California

Well Number	Date Sampled	Color	pН	Total Cyanide (µg/L)	Total Chromium (µg/L)	Chromium VI (µg/L)	Cadmium (µg/L)	Nickel (μg/L)
MW1	12/07/1998	NA	7.48	NA	NA	NA	NA	NA
101 00 1	03/03/1999	NA	7.04	NA	19	ND<20	ND<4	NA
	06/24/1999	NA	7.34	NA	19	ND<20	ND<4	NA
	09/17/1999	NA	7.37	NA	16	ND<20	ND<4	NA
	12/20/1999	NA	NA	NA	37	ND<20	ND<3	NA
	03/28/2000	NA	7.22	NA	4	NA	NA	NA
	06/26/2000	NA	NA	NA	46	NA	NA	NA
	09/22/2000	NA	7.53	NA	ND<3	NA	NA	NA
	12/18/2000	NA	6.83	NA	20	ND<20	ND<3	NA
	03/05/2001	NA	7.05	NA	11	ND<20	ND<3	NA
	06/04/2001	NA	7.07	NA	19	NA	ND<3	NA
	09/24/2001	NA	7.35	NA	8.42	ND<1.0	ND<5	NA
	12/13/2001	NA	7.38	NA	22.5	ND<1.0	ND<5	NA
	03/27/2002	NA	7.04	NA	15.4	ND<1.0	ND<5	NA
	10/30/2002	NA	NA	NA	ND<5	ND<1.0	ND<5	NA
	05/06/2003	NA	7.35	NA	ND<5	ND<1.0	ND<5	NA
	11/07/2003	NA	NA	NA	8.03	ND<1.0	ND<5.00	NA
	03/14/2008	5.0	7.17	ND<50	ND<5.00	ND<0.20	ND<5.00	8.75
	03/18/2011	NA	NA	NA	NA	NA	NA	NA
	06/20/2011	NA	NA	NA	NA	NA	NA	NA
	09/22/2011	NA	NA	NA	NA	NA	NA	NA

TABLE 6
Summary of Additional Chemical Analyses of Groundwater Samples
Former Mondo Chrome Facility
4933 Firestone Boulevard
South Gate, California

Well Number	Date Sampled	Color	pН	Total Cyanide (µg/L)	Total Chromium (μg/L)	Chromium VI (µg/L)	Cadmium (µg/L)	Nickel (μg/L)
MW2	12/07/1998	NA	7.20	NA	NA	NA	NA	NA
141 44 2	03/03/1999	NA	6.91	NA	33	ND<20	ND<4	NA
	06/24/1999	NA	7.17	NA	50	ND<20	ND<4	NA
	09/17/1999	NA	7.16	NA	40	ND<20	ND<4	NA
	12/20/1999	NA	NA	NA	18	ND<20	ND<3	NA
	03/28/2000	NA	7.37	NA	19	NA	NA	NA
	06/26/2000	NA	NA	NA	38	NA	NA	NA
	09/22/2000	NA	7.57	NA	17	NA	NA	NA
	12/18/2000	NA	6.62	NA	20	ND<20	ND<3	NA
	03/05/2001	NA	7.03	NA	23	ND<20	3	NA
	06/04/2001	NA	7.05	NA	28	NA	ND<3	NA
	09/24/2001	NA	7.27	NA	6.73	ND<1.0	ND<5	NA
	12/13/2001	NA	7.30	NA	12.1	ND<1.0	ND<5	NA
	03/27/2002	NA	7.11	NA	9.67	ND<1.0	ND<5	NA
	10/30/2002	NA	NA	NA	17.6	ND<1.0	ND<5	NA
	05/06/2003	NA	7.03	NA	ND<5	ND<1.0	ND<5	NA
	11/07/2003	NA	NA	NA	ND<5	ND<1.0	ND<5	NA
	03/14/2008	10	7.06	ND<50	6.41	ND<1.0	ND<5.00	NA
	03/18/2011	NA	NA	NA	NA	NA	NA	NA
	06/20/2011	NA	NA	NA	NA	NA	NA	NA
	09/22/2011	NA	NA	NA	NA	NA	NA	NA

TABLE 6 Summary of Additional Chemical Analyses of Groundwater Samples Former Mondo Chrome Facility 4933 Firestone Boulevard South Gate, California

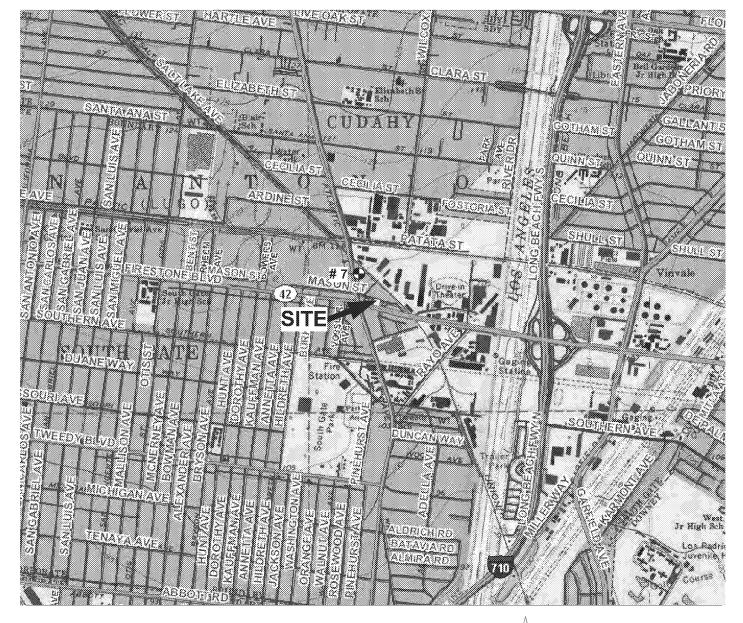
Well	Date			Total	Total			
Number	Sampled	Color	pН	Cyanide	Chromium	Chromium VI	Cadmium	Nickel
				(µg/L)	(μg/L)	(µg/L)	(μg/L)	(µg/L)
MW3	12/07/1998	NA	7.29	NA	NA	NA	NA	NA
141 44 2	03/03/1999	NA	6.9	NA	68	ND<20	ND<4	NA
	06/24/1999	NA NA	7.46	NA NA	50	ND<20 ND<20	ND<4 ND<4	NA NA
	09/17/1999	NA	6.16	NA	58	ND<20 ND<20	ND<4	NA
	12/20/1999	NA	NA	NA	37	ND<20 ND<20	ND<3	NA
	03/28/2000	NA	7.29	NA	19	NA NA	NA	NA
	06/26/2000	NA	NA	NA	44	NA	NA	NA
	09/22/2000	NA	7.35	NA	20	NA	NA	NA
	12/18/2000	NA	6.51	NA	30	ND<20	ND<3	NA
	03/05/2001	NA	7.02	NA	24	ND<20	6	NA
	06/04/2001	NA	7.19	NA	26	NA	3	NA
	09/24/2001	NA	7.40	NA	7.74	ND<1.0	ND<5	NA
	12/13/2001	NA	7.36	NA	9.35	ND<1.0	ND<5	NA
	03/27/2002	NA	6.85	NA	11.8	ND<1.0	ND<5	NA
	10/30/2002	NA	NA	NA	11.6	ND<1.0	ND<5	NA
	05/06/2003	NA	7.25	NA	8.12	ND<1.0	ND<5	NA
	11/07/2003	NA	NA	NA	5.04	ND<1.0	ND<5	NA
	03/14/2008	10	6.98	ND<50	ND<5.00	ND<0.20	ND<5.00	21.0
	03/18/2011	NA	NA	NA	NA	NA	NA	NA
	06/20/2011	NA	NA	NA	NA	NA	NA	NA
	09/22/2011	NA	NA	NA	NA	NA	NA	NA
OHS MCLs					50		5	100

Notes:

ND Not detected above laboratory detection limit

NA Not analyzed

FIGURES



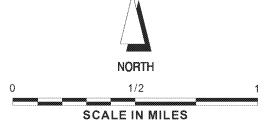
EXPLANATION



NOTE:

quadrangle.

CITY OF SOUTH GATE WELL #7



FORMER MONDO CHROME FACILITY 4933 FIRESTONE BOULEVARD SOUTH GATE, CALIFORNIA

Client: TEDESCO LEASING Project No.: 172-01

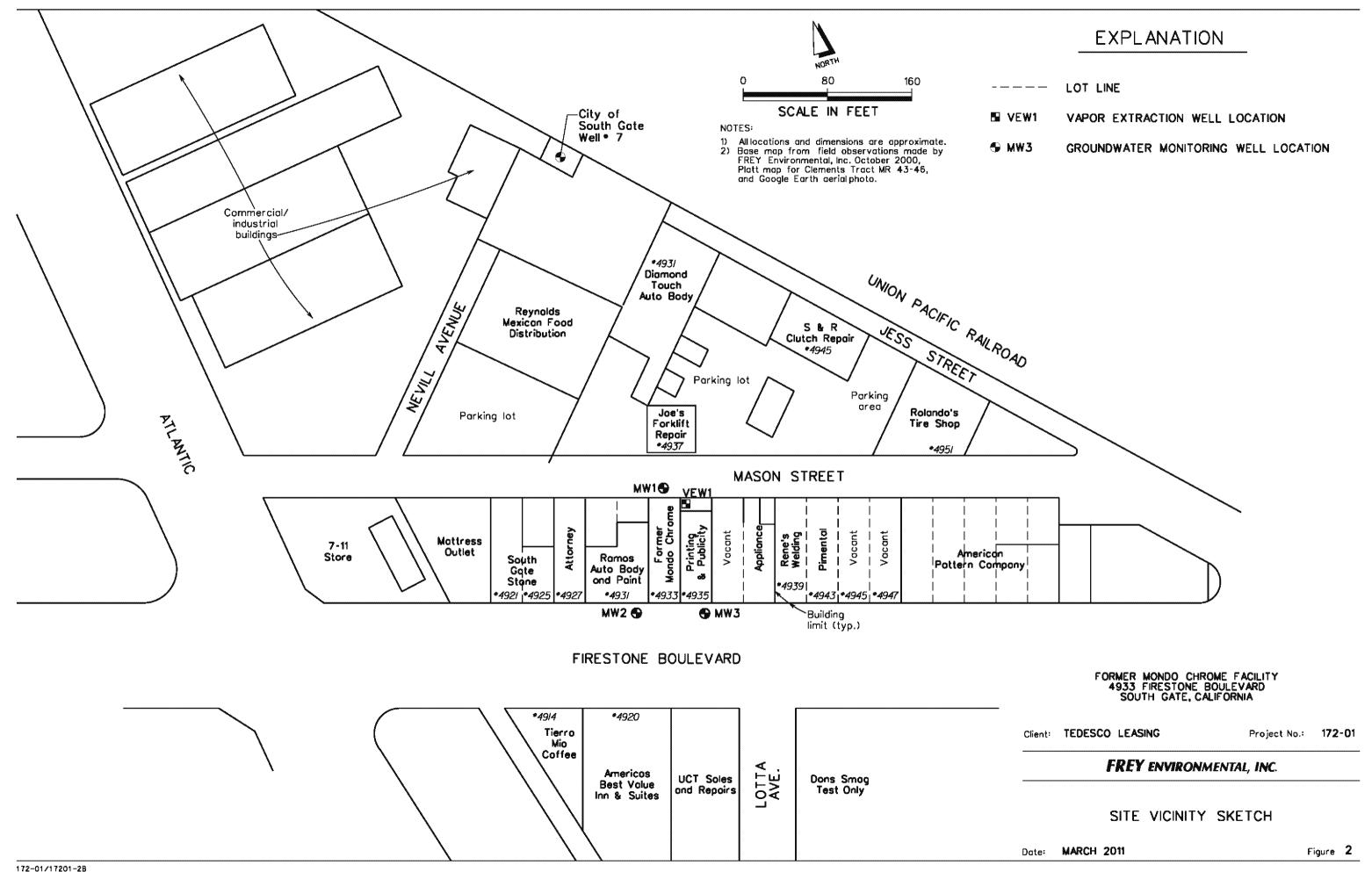
FREY ENVIRONMENTAL, INC.

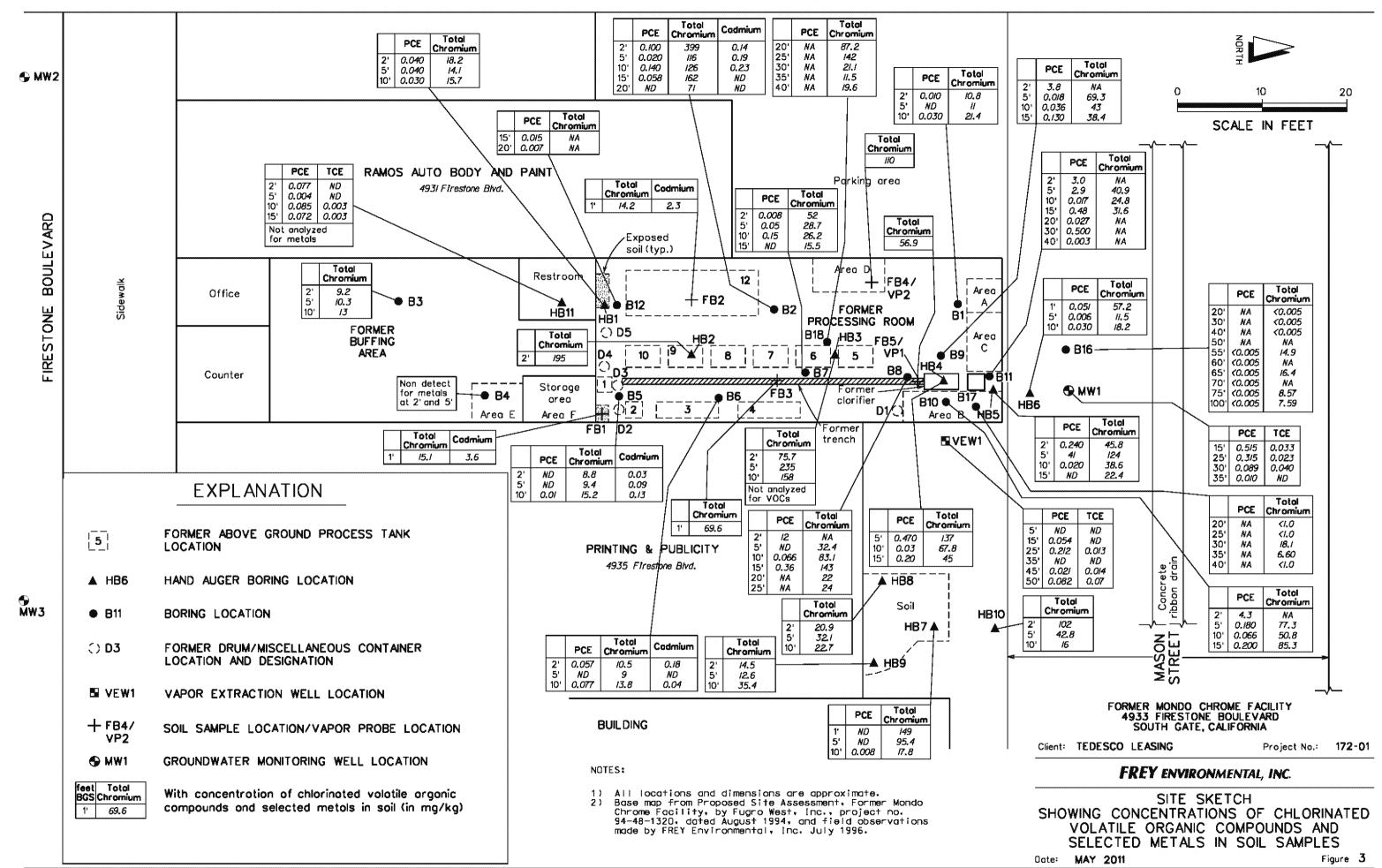
(1978, photorevised 1981), California topographic SITE LOCATION MAP

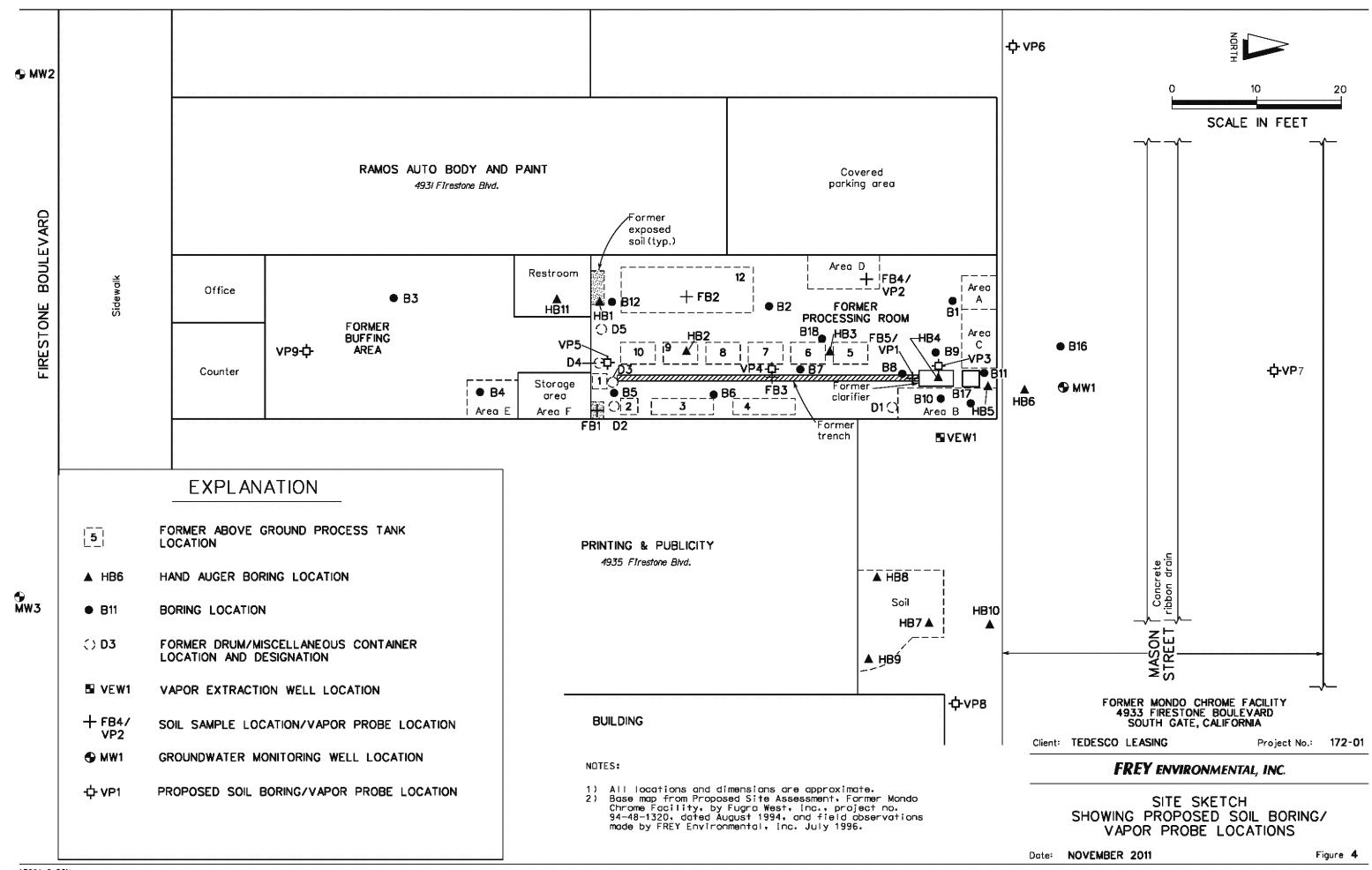
3) Groundwater well data from Fugro West, Inc., project no. 94-48-1320.

1) All locations and dimensions are approximate. 2) Base map from USGS 7.5 minute South Gate

Date: MAY 2008 Figure: 1



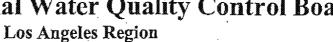




APPENDIX A RWQCB LETTER DATED JANUARY 26, 2011



California Regional Water Quality Control Board





da S. Adams.

g Secretary for
Environmental Affairs

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.waterboards.ca.gov/losangeles

Edmund G. Brown, Jr. Governor

January 26, 2011

Mr. Howard L. Kay Tedesco Leasing Partnership 475 17th Street, Suite 940 Denver, Colorado 80202 Certified Mail
Return Receipt Required
Claim No. 7009 0820 0001 6811 9961

SUBJECT:

NOTICE OF VIOLATION FOR DELINQUENT TECHNICAL REPORTS

PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER

SITE/CASE:

MONDO CHROME (FORMER) AT 4933 FIRESTONE, SOUTH GATE,

CALIFORNIA, 90280 (SCP NO. 0760, SITE ID NO. 2043G00)

Dear Mr. Kay:

The California Regional Water Quality Control Board (Regional Board), Los Angeles Region, is the State regulatory agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties, including the referenced site. To accomplish this, the Regional Board issues investigative orders authorized by the Porter Cologne Water Quality Control Act (California Water Code [CWC], Division 7).

The Regional Board issued a California Water Code (CWC) Section 13267 Order (Order) dated February 19, 2008 (copy attached) directing you to conduct a Phase I assessment, soil vapor survey, soil and groundwater assessment and groundwater monitoring at the site. You were required to document your efforts and submit technical reports to the Regional Board. In response to the Order, your environmental consultant Frey Environmental, Inc. (Frey) submitted a groundwater monitoring report dated May 5, 2008 to the Regional Board. On June 5, 2008, Regional Board staff left you a telephone message informing you that you were delinquent in submitting the remaining technical reports required in the Order. In a meeting held on June 25, 2008, Regional Board staff discussed with you the site status and Regional Board requirements. Subsequently, in an e-mail dated July 14, 2008, Frey provided an outline of technical reports planned to be submitted to the Regional Board by September 11, 2008. In telephone conversations on June 29, 2009 and July 1, 2009, Regional Board staff again informed you of your obligation under the Order to conduct the work and to submit the reports to the Regional Board.

To date, the Regional Board has not received the required documents. You are hereby notified that you are in violation of the CWC Section 13267 Order issued on February 19, 2008 by the Regional Board Executive Officer, by failing to provide the following:

- 1. A Phase I Report, due March 28, 2008;
- 2. A Soil Vapor Survey Workplan, due March 28, 2008;
- 3. A Soil Investigation Workplan due March 28, 2008;
- 4. A Groundwater Investigation Workplan, due March 28, 2008; and

California Environmental Protection Agency

5. Groundwater Monitoring Reports due quarterly, the first report was due April 15, 2008.

You are hereby notified that you have violated CWC section 13267 by failing to submit the technical report, workplans and quarterly groundwater monitoring reports according to the schedule and requirements specified in the Order dated February 19, 2008. You are required to comply with the Order immediately.

Section 13267 of the CWC provides the Regional Board the authority to require, under penalty of perjury, all needed technical and monitoring program reports for investigating the quality of any waters of the State.

Pursuant to section 13268 of the CWC, you are now subject to the imposition of civil liability penalties by the Regional Board in an amount up to one thousand dollars (\$1,000) for each day that you are out of compliance with the Order. The matter may be referred to the Attorney General for further enforcement. The Regional Board reserves its right to take any further enforcement action authorized by law.

If you have any questions, please contact Adnan Siddiqui at (213) 576-6812 (asiddiqui@waterboards.ca.gov) or Dr. Arthur Heath at (213) 576-6725 or (aheath@waterboards.ca.gov).

Sincerely,

Paula Rasmussen, Chief

Compliance and Enforcement Section

Attachments: CWC 13267 Order dated February 19, 2008

APPENDIX B HEALTH AND SAFETY PLAN

HEALTH AND SAFETY PLAN

FORMER MONDO CHROME 4933 FIRESTONE BOULEVARD SOUTH GATE, CALIFORNIA

PROJECT NO. 172-01

FREY ENVIRONMENTAL, INC. 2817 A Lafayette Avenue Newport Beach, CA 92663

November 2011

U.S.A. Number_____

Revie	wed by:
Project Manager	Date
Site Geologist	Date
Field Technician	Date
Visitor	Date
 Visitor	 Date

1.0 INTRODUCTION

FREY Environmental, Inc. (FREY), has been retained by the Kay Companies and Tedesco Leasing to conduct a soil investigation and soil vapor survey at 4933 Firestone Boulevard in South Gate, California (Site).

This document presents the health and safety procedures that are intended to guide field activities at the Site. The provisions of this plan apply to employees of FREY and its subcontractors. Regulatory agencies are expected to observe the safety rules and regulations established by their respective organizations in addition to the requirements of this document.

2.0 PROJECT SAFETY PERSONNEL

2.1 SAFETY PERSONNEL

FREY has been responsible for the preparation of this health and safety plan, and is to monitor compliance of its personnel, those of its subcontractors and visitors to the Site, with its provisions. FREY personnel responsible for the distribution of this health and safety plan and for the compliance audit are the Site Safety Officer and/or Project Manager.

The Project Safety Officer is responsible for delivering the plan and any addenda to the Project Manager and for advising the Project Manager and Site Safety Officer on health and safety provisions of this plan, suspend work or modify work practices for safety reasons, and to dismiss individuals whose conduct on site endangers the health and safety of others.

The Project Manager is responsible for distributing the plan to all FREY field personnel and to an authorized representative of each firm contracted to assist with on-Site work. The Project Manager is also responsible for implementing the provisions of this plan and its addenda. Implementation will include training of field personnel involved with the project, provision for the appropriate safety equipment, and that the required health and safety documents are submitted to the Project Safety Officer.

The Site Safety Officer is responsible for assisting the Project Manager with on-Site implementation of this Site safety plan. His responsibilities include: 1) maintaining safety equipment supplies, 2) performing air quality measurements as required or needed, 3) directing decontamination operations and emergency response operations, 4) setting up work zone markers and signs if such zones are specified in the Site safety plan, and 5) reporting all accidents, incidents, and infractions of safety rules and requirements to the Project Manager and the Project Safety Officer.

The Site Safety Officer has the authority to suspend work any time he determines that the provisions of the Site safety plan are inadequate to provide a working environment conducive to worker safety and he is to inform the Project Manager of individuals whose on-Site presence jeopardizes their health and safety or the health and safety of others.

FREY Environmental, Inc. phone numbers

Project Safety Officer/Manager	Evan Privett	(949) 723-1645
Site Safety Officer	Josh Moeller	(949) 370-1086
and Field Personnel	Vitelio Rameriz	(949) 456-5075

3.0 WORK DESCRIPTION

- Core through the concrete or asphalt in 7 locations
- Drill soil borings to depths of up to 45 feet bgs;
- Collect soil samples from 6 of the 7 borings;
- Construct soil vapor probes in each of the 7 holes;
- Collect soil vapor samples from soil vapor probes and two existing soil vapor probes;
- Analyze soil vapor samples for VOCs in an on-Site mobile laboratory.

4.0 HAZARD ASSESSMENT

According to available information, the chemical concern most likely to be encountered during the field work appears to be chlorinated solvents. This health and safety plan will use perchloroethylene (PCE) as the contaminant of concern based on its lower health and safety thresh-hold than many other chlorinated solvents detected during previous investigations. The overall hazard to FREY personnel and associated subcontractors is estimated to be low. The following is a brief description of the potential hazards associated with these compounds:

4.1 HAZARDOUS CHEMICAL COMPOUNDS

PCE has been tentatively classified as a known or suspected human or mammalian carcinogen. Direct skin or eye contact or exposure to high vapor concentrations may result in dermatitis, eye and/or lung irritation; acute overexposure may cause central nervous system depression, liver and or kidney damage, convulsions, coma, and even death. Symptoms can include headache, nausea, dizziness, increased perspiration, staggering gait, and slowing of mental ability.

A. Anticipated Concentrations: Based on previous investigations, concentrations of PCE are not anticipated to exceed 1 part per million. The soil vapor probes will be installed by advancing a hollow steel rod. Minimal amounts of soil will be disturbed using this installation technique which will minimize worker exposure to soil vapor.

- B. Exposure Routes: Inhalation, dermal/eye contact, absorption
- C. PCE Exposure Limit -100 ppm TWA/200 ppm Ceiling (OSHA PEL). 150 ppm IDLH.

4.2 INHALATION HAZARD

The major toxicity concern is PCE. PCE has a Threshold Limit Value (TLV) of 25 ppm, which is defined as the average exposure for a period of 8 hours per day, 5 days per week that is believed will not cause harm to worker health.

Vapor concentrations expected to encountered during soil vapor probe installation are not expected to exceed recommended exposure limits, based on available Site information. However, respiratory protection (level C) must be used if concentrations reach 10 ppm as measured with a photoionization detector (PID).

4.3 DERMAL EXPOSURE HAZARD

Contact of sufficient duration to cause significant absorption of toxic components is highly unlikely. Repeated daily or prolonged contact with excavated objects or soils may be expected to defat the skin and perhaps, over a long period of time, lead to irritation and dermatitis. For this reason, direct contact with highly contaminated objects or soils should be avoided when possible by wearing gloves. However, if prolonged skin contact does occur, the exposed areas shall be washed with soap and water and rinsed thoroughly.

4.4 EXPLOSION HAZARD

PCE is not susceptible to explosions except under extreme temperatures which will not be attained during Site work. Explosive Limits have been listed as not applicable for PCE.

4.5 OTHER HAZARDS

Sufficient attention must be paid to other possible hazards on the Site including but not limited to:

- Improper use of hand tools. Hand tool use includes the manual installation of the soil vapor probes using a jackhammer. Hazards associated with the use of this tool include noise and weight. The operator must wear hearing protection, steel toed work boots and gloves.
- Tripping on objects. Four soil vapor probes will be located inside the building. The building consists of a machine shop which may contain several machines, tools and other items considered to be tripping hazards. The access to the probes to be installed in the building require clear access and will be discussed with the occupant prior to entry.

- Dehydration or sun stroke of the personnel. The work is anticipated to be conducted in the summer when temperatures may be high which increases the chance for a heat related condition to occur.
 - If an employee's pulse rate exceeds the maximum age adjusted heart rate (0.7(220-AGE)), and /or oral temperature exceeds 100.4 ° F, the employee shall be required to stop work and rest or move to an air-conditioned room. The affected employee may be allowed to return to work after his / her pulse rate has dropped below 100 beats per minute. Fluids shall be provided and rest breaks will be taken. The frequency of breaks will increase with the temperature. Such items as cooling vests, portable fans and breaks in air-conditioned areas shall be used if necessary.
- Lack of oxygen through blockage of face masks. The area of exposure is limited to a four inch circular hole (0.087 square feet) cut through concrete. Thus, the use of respirators is extremely unlikely. However, personnel on Site will have new respirator cartridges which have been factory certified for reliability and quality.

5.0 GENERAL HEALTH AND SAFETY REQUIREMENTS

5.1 SAFETY ORIENTATION MEETING

All field personnel should attend a safety orientation meeting before commencing the field work. The meeting will be scheduled and conducted by the project manager or the Site safety officer. The meeting will include presentation of the site safety plan.

5.2 WORK ZONE

A restricted zone will be maintained to a distance of 25 feet from the work activity area if significant contamination is detected in the field. Significant soil contamination is defined in this case to be soil which registers in excess of 10 ppm on the photoionization equipment. Protective clothing and equipment, as described in subsection 5.3 are to be worn by all personnel working within the restricted zone.

The staff geologist will be responsible from preventing access to the area of investigation. The restricted work zone (area of investigation) will be coned off with the staff geologist located on the outside of the coned area to prevent access into the restricted zone. The decontamination area will be located outside the restricted zone and will consist of two 5-gallon buckets filled with tap water and one 5-gallon bucket filled with deionized water. The first bucket in series will contain TSP with tap water, the second bucket will contain tap water and the third bucket will contain the deionized water.

Communication will be by verbal commands when applicable and by cell phone when distances exceed those applicable through verbal communication.

5.3 PROTECTIVE EQUIPMENT AND CLOTHING

Protective clothing required to be on Site is limited to level C and level D as defined by the EPA Office of Emergency and Remedial Response. Levels C and D were selected based on the knowledge that exposure pathways are anticipated to be minimal and are realistically limited to: 1) vapors emanating through 8-inch diameter boreholes, 2) over 20,000 hours of SVE was conducted after PCE was no longer used at the Site, and; 3) the handling of each sample tube (2-inch in diameter and 6-inches long).

5.3.1 EQUIPMENT REQUIRED FOR FIELD PERSONNEL (LEVEL D)

- Full length trousers, shirts
- Leather work shoes or Safety Boots
- Hard hats when near within the tower height distance of the direct push drill rig
- Gloves, Glasses or Goggles

5.3.2 EQUIPMENT REQUIRED TO BE AVAILABLE ON SITE

- Four respirators (North 7700 Series Half Mask Facepiece)
- Disposable Coveralls (Tyveks)
- Gloves (Montgomery Premium Nitrile)
- First-aid kit
- Fire extinguisher
- A vehicle must be kept on Site when personnel are working for the transport of slightly injured personnel to the hospital. Severely injured personnel must only be transported by paramedics.

5.3.3 RESPIRATOR USAGE

The Project Safety Officer and/or the Project Manager is responsible for deciding if respirators should be used. Usage would be based on PID measurements. The TLV concentrations as noted in section 4.1 should be used as the critical concentration. If concentrations of organic vapors in the ambient air (as measured by the PID) exceed 25 ppm, the field personnel must move out of the area. If the concentration remains at or above the TLV for more than 5 minutes, the Project Safety Officer and/or the Project Manager should be contacted and a decision made regarding whether to proceed with the work wearing respirators and extending the restricted work zone. Cartridges for the respirators must be replaced daily or when break-through occurs, whichever occurs first.

5.4 WORK IN MASON STREET

Two soil vapor probes are proposed to be installed and sampled in Mason Street. Traffic control will be constructed per the attached WATCH Manual guidelines. In addition, all conditions listed in the encroachment permit will be followed during installation and sampling of the soil vapor probes.

6.0 ORGANIC VAPOR MONITORING

The organic vapor concentrations (as measured by the PID) in the breathing zone of the individual working closest to the vapor source will be monitored as needed. Respirators must be worn if the concentrations exceed 10 ppmv as measured with the PID.

7.0 EMERGENCY RESPONSE PROCEDURES

7.1 PHYSICAL INJURY

In the event of an accident resulting in physical injury, apply first aid. Severely injured personnel are to be transported only by paramedics and/or by ambulance personnel. At the hospital, a physicians attention is mandatory regardless of how serious the injury appears.

The Project Manager is to be notified by the Site Safety Officer, as soon after the injury as practical, regarding the nature of the accident. A written report is also to be prepared and submitted by the Site Safety Officer.

7.2 FIRE, EXPLOSION, AND PROPERTY DAMAGE

In the event of a fire or explosion, notify the Fire department immediately by dialing 911. The Project Manager is to be notified by the Site Safety Officer as soon as practical and a written report prepared.

7.3 DECONTAMINATION PROCEDURES

Decontamination procedures will consist of washing down the exposed skin area in the event that chemical exposure. The affected area of exposure will be washed with TSP and water then rinsed with a deionized water rinse. Personnel protective equipment was described in 5.3.1. Drilling equipment will be decontaminated with a three bucket system. The first bucket will contain TSP and tap water followed by a tap water rinse and a deionized water rinse. All down drilling equipment will be dried with towel used one single time. Discarded towels will be placed in a plastic bag and washed at a later date.

The rest area will be anywhere outside of the restricted zone. Worker fatigue is not anticipated due to the short term nature of this job.

All decontamination water will be placed in a Department of Transportation approved 55-gallon drum and disposed of at Crosby and Overton, a State of California licensed hazardous waste recycling facility in Long Beach, California.

7.4 TRAINING

All on Site personnel have received 40 hour HAZWOPER training. 8-Hour HAZWOPER Refresher training certificates have been attached for FREY employees who will be on Site. Employees are generally fit tested during each 8-hour refresher course. Employees are also subjected to medical exams (physicals) on a yearly basis.

7.5 MEDICAL MONITORING

Personnel will be observed in the field by the Staff Geologist for signs of fatigue or chemical exposure. Visual observation is sufficient due the minor amounts of chemicals present in subsurface soils at the Site, minimal exposure pathways as discussed Section 5.3, and the short term duration of the project (one day).

7.6 EMERGENCY TELEPHONE NUMBERS......911

7.8 HOSPITAL ADDRESS AND ROUTE

See attached figure

St Francis Medical Center 3630 East Imperial Highway Lynwood, CA 90262 (310) 900-8900

8.0 PROJECT PERSONNEL

Project Safety Officer/Manager Evan Privett

Site Safety Officer Josh Moeller and Field Personnel Vitelio Rameriz

Concrete Coring Contractor Glenn F Barton

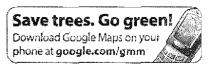
Direct Push Contractor Kehoe Testing and Engineering

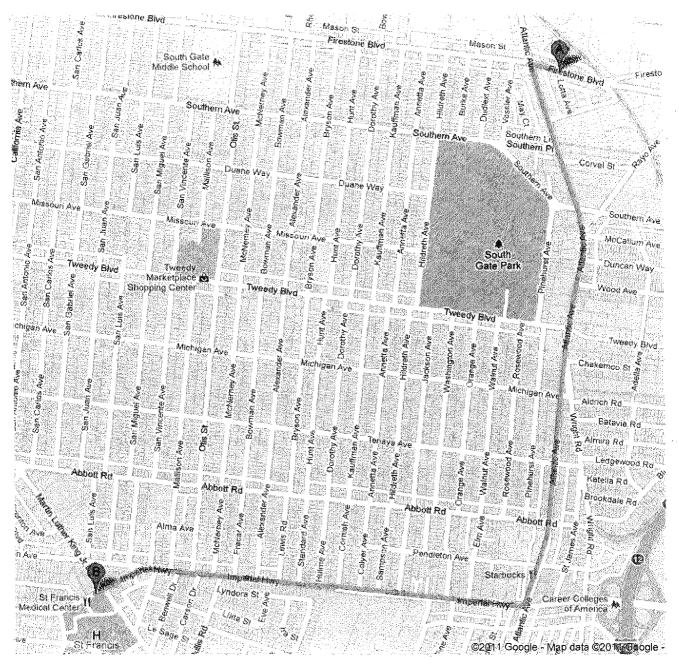
Mobile Laboratory Baseline On-Site Analysis



Directions to 3630 Imperial Hwy, Lynwood, CA

2.7 mi - about 7 mins







4933 Firestone Blvd, South Gate, CA 90280

1. He	ad west	on Firestone	Blvd toward	Atlantic Ave
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go 413 ft total 413 ft

2. Turn left onto Atlantic Ave About 4 mins

go 1.5 mi total 1.6 mi

go 1.2 mi

3. Turn right onto Imperial Hwy Destination will be on the left About 3 mins

total 2.7 mi



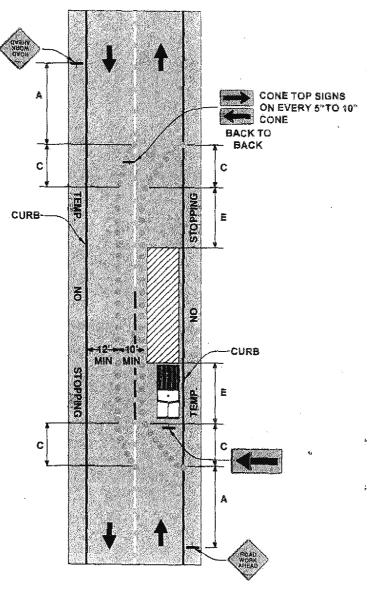
3630 Imperial Hwy, Lynwood, CA 90262

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your

Map data @2011 Google

Directions weren't right? Please find your route on maps google.com and click "Report a problem" at the bottom left.

Work on Minor Street



NOT TO SCALE

APPENDIX C MULTI-DEPTH SOIL VAPOR PROBE DIAGRAM

MULTI-DEPTH SOIL VAPOR PROBE DIAGRAM

